

EXHIBIT L

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

THE WIMBLEDON FUND, SPC (CLASS)	
TT),)	
)	
PLAINTIFFS,)	
)	
VS.)	CASE NO.
)	2:15-CV-6633-CAS-ASJWx
)	
GRAYBOX LLC; INTEGRATED)	
ADMINISTRATION; EUGENE SCHER, AS)	
TRUSTEE OF BERGSTEIN TRUST; AND)	
CASCADE TECHNOLOGIES CORP,)	
)	
DEFENDANTS.)	
_____)	

VIDEOTAPED DEPOSITION OF KIARASH JAM, 30(B)(6)

TAKEN ON

THURSDAY, MARCH 28, 2019

Sandra Mitchell
C.S.R. 12553

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15 CASCADE TECHNOLOGIES CORP.,)
16)
17 DEFENDANTS.)
18 _____)
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VIDEOTAPED DEPOSITION OF KIARASH JAM, 30(B)(6) taken on
behalf of the Plaintiff, at 10100 Santa Monica Boulevard,
13th Floor, Los Angeles, California, commencing at
9:57 a.m., Thursday, March 28, 2019, before Sandra Mitchell,
C.S.R. 12553, pursuant to Notice.

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1 APPEARANCES:
2 For the Plaintiffs, THE WIMBLEDON FUND, SPC (CLASS TT):
3 COLE SCHOTZ
4 BY: JAMES W. WALKER, ESQ.
5 901 MAIN STREET, SUITE 4120
6 DALLAS, TEXAS 75202
7 (469) 557-9391
8 E-MAIL: JWALKER@COLESCHOTZ.COM
9
10 For the Plaintiffs, THE WIMBLEDON FUND, SPC (CLASS TT):
11 COLE SCHOTZ
12 BY: ERIC S. LATZER, ESQ.
13 COURT PLAZA NORTH
14 25 MAIN STREET
15 HACKENSACK, NEW JERSEY 07601
16 E-MAIL: ELATZER@COLESCHOTZ.COM
17
18 For the Defendants, KIARASH JAM:
19 LAW OFFICE OF DAVID WIECHERT
20 BY: WILLIAM J. MIGLER, ESQ.
21 27136 PASEO ESPADA, SUITE B1123, ESQ.
22 SAN JUAN CAPISTRANO, CALIFORNIA 92675
23 (949) 361-2822
24 E-MAIL: WILLIAM@DAVIDWIECHERT.COM
25
26
27
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Also Present:

BRANDON CAHELA, VIDEOGRAPHER

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QUESTIONS INSTRUCTED NOT TO ANSWER
(NONE)

INFORMATION REQUESTED
(NONE)

2 (Pages 2 to 5)

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00:00:01	1 LOS ANGELES, CALIFORNIA, THURSDAY, MARCH 28, 2019	10:01:27	1 A That is correct.
	2 AT 9:57 A.M.		2 Q Okay. I've placed in front of you what I've
	3		3 marked as Exhibit 1.
	4 THE VIDEOGRAPHER: Good morning. We are on the		4 (Exhibit 1 was marked for
09:59:32	5 record. My name is Brandon Cahela. I'm a notary	10:01:34	5 identification by the Court Reporter
	6 public, contracted by eLitigation Services.		6 and is attached hereto.)
	7 I am not financially interested in this action,		7 BY MR. LATZER:
	8 nor am I a relative or employee of any of the attorneys		8 Q And Exhibit 1 is the Notice of Rule 30(B)(6),
	9 or any of the parties.		9 deposition of defendant Integrated Administration.
09:59:45	10 Today is March 28, 2019, and the time is	10:01:48	10 Have you seen this document before?
	11 approximately 9:57 a.m. This video deposition being		11 A I don't know. I don't think so.
	12 taken at 10100 Santa Monica Boulevard on the 13th floor,		12 Q Okay. I'm going to ask you to turn to page 2.
	13 Los Angeles, California 90067.		13 A Yes, sir.
	14 The name of the case is the Wimbledon Fund		14 Q And just to be clear, it's the one that's
10:00:11	15 versus Graybox LLC, filed in the United States District	10:02:06	15 No. 2. It's actually page 3 of the document.
	16 Court, Central District of California, Western Division.		16 A Oh.
	17 The Case No. is CV-6633-CAS-AJWx. This is		17 Q I think you're on the right page. It says
	18 Volume 2 in the videotaped deposition of Mr. Kia Jam,		18 "Topics" at the bottom.
	19 and this deposition today is being taken by attorney		19 A Yes, but it says "2" on the bottom.
10:00:39	20 Eric S. Latzer.	10:02:15	20 Q Right. That's the one I want you to look at --
	21 Would the attorneys introduce themselves and		21 A Okay. Okay.
	22 state who you represent.		22 Q So the instructions are unclear.
	23 MR. LATZER: Eric Latzer for the Plaintiff.		23 A Okay. Thank you.
	24 MR. WALKER: Jim Walker for plaintiff.		24 Q So beginning on the bottom of that page where
10:00:52	25 MR. MIGLER: William Migler for defendant.	10:02:20	25 it says, "Topics," and then continuing on to the next
Page 7		Page 9	
10:00:54	1 THE VIDEOGRAPHER: Thank you. We are ready to	10:02:23	1 page, there are 14 listed topics.
	2 proceed. The court reporter today is Sandi Mitchell		2 Do you see that?
	3 with eLitigation Services. Would the reporter please		3 A Yes, I do.
	4 swear in the witness so we can begin.		4 Q Okay. Have you seen this list of topics
10:01:01	5 THE REPORTER: Please raise your right hand.	10:02:34	5 before?
	6 Do you solemnly swear in the cause		6 A I don't know.
	7 now pending to tell the truth, the		7 Q Okay. Why don't you take a minute to look at
	8 whole truth, and nothing but the		8 those 14 topics.
	9 truth, so help you God?		9 A Okay. Okay.
10:01:09	10 THE WITNESS: Yes, I do.	10:03:21	10 Q Okay. You had a chance to review those topics?
	11 THE REPORTER: Thank you very much.		11 A Yes.
	12 KIARASH JAM,		12 Q And my question is, are you prepared to discuss
	13 having been duly sworn,		13 these topics with me today?
	14 was examined and testified as follows:		14 A I'll answer any questions you ask me.
10:01:09	15	10:03:31	15 Q Okay. Let's talk about Integrated
	16 EXAMINATION		16 Administration. You testified yesterday that it was a
	17 BY MR. LATZER:		17 company that, as you said, was set up to pay people and
	18 Q Good morning, Mr. Jam.		18 payroll; is that correct?
	19 A Good morning to you, sir.		19 A That's part what I did, yes.
10:01:15	20 Q You were deposed yesterday in your individual	10:03:42	20 Q Okay. And I believe you also testified that
	21 capacity; is that correct?		21 Integrated Administration only provided services for
	22 A Yes, sir.		22 companies and individuals with which you or
	23 Q And you understand that today you're being		23 Mr. Bergstein was affiliated; is that correct?
	24 deposed in your capacity as a corporate representative		24 A That's my recollection. Yes.
10:01:24	25 for the defendant Integrated Administration?	10:03:55	25 Q Okay.

Page 10		Page 12	
10:03:56	1 A Is this done?	10:06:13	1 Q Okay. And your name is listed there?
	2 Q Yeah. You can set it to the side like you did		2 A Yes, sir.
	3 yesterday.		3 Q So you were appointing yourself as the chief
	4 I'm going to show you what's been marked as		4 executive officer of Integrated Administration?
10:04:04	5 Exhibit 2.	10:06:21	5 A That's correct.
	6 (Exhibit 2 was marked for		6 Q And No. 6 says "Secretary"?
	7 identification by the Court Reporter		7 A That is correct.
	8 and is attached hereto.)		8 Q And you were appointing yourself as the
	9 BY MR. LATZER:		9 secretary of the Integrated Administration?
10:04:10	10 Q And if you can let me know when you've had a	10:06:29	10 A That's correct.
	11 minute to look through that document.		11 Q And No. 7 states "Chief Financial Officer."
	12 A Okay.		12 And you appointed yourself as the chief financial
	13 Q Are you able to describe for me, generally,		13 officer of Integrated Administration?
	14 what this exhibit consists of?		14 A That's correct.
10:04:38	15 A The corporate documents for Integrated	10:06:39	15 Q And just continuing down, No. 8 is under the
	16 Administration. The California company.		16 section that states, "Names and complete address of all
	17 Q Okay. Now what prompted you to establish		17 directors including directors who are also officers."
	18 Integrated Administration?		18 Did I read that correctly?
	19 A Uh, David and -- and I were going to be		19 A Yes, you did, sir.
10:04:55	20 co-officing together. He asked that I set up a company	10:06:56	20 Q Okay. And next to No. 8, it says your name.
	21 that would handle payroll and overhead services, and		21 Do you see that?
	22 that he would fund it, and I did.		22 A Yes, sir.
	23 Q Okay. So the first page of this exhibit is --		23 Q Okay. So you were appointing yourself a
	24 at the top you see a Statement of Information.		24 director of Integrated Administration?
10:05:14	25 Do you see that?	10:07:03	25 A Yes, sir.
Page 11		Page 13	
10:05:14	1 A Yes, I do.	10:07:03	1 Q And you were the only director of the company?
	2 Q Okay. And on the bottom right of the page, is		2 A Yes, sir.
	3 that your signature?		3 Q Did that change at any time?
	4 A Yes, it is.		4 A No, sir.
10:05:23	5 Q Okay. And did you sign this document on or	10:07:09	5 Q Okay. And throughout it's -- well, strike
	6 about August 16, 2011?		6 that.
	7 A I -- I signed it. I don't remember when I		7 Was there any point in time where you weren't
	8 signed it. It makes sense that it would been on -- on		8 the chief executive officer of the company?
	9 or around that day.		9 A No, sir.
10:05:36	10 Q Okay. And what did you understand this	10:07:20	10 Q And was there any point in time where you
	11 document to do?		11 weren't the secretary of the company?
	12 A As part of the corporate formation documents		12 A No, sir.
	13 that needed to be filled out to start a company.		13 Q And was there any point in time where you
	14 Q Okay. And did you have any assistance in		14 weren't the chief financial officer the company?
10:05:48	15 establishing Integrated Administration?	10:07:32	15 A No, sir.
	16 A I don't remember. Maybe I used one of those		16 Q Let's turn to the second page of the exhibit,
	17 companies that set up companies for you. I don't		17 and I'm going to refer you --
	18 remember.		18 A Seventy-eight, I think?
	19 Q Okay. Do you recall whether you had a lawyer		19 Q Yes. Like Mr. Walker did yesterday, I will, at
10:05:58	20 assist you in the process?	10:07:52	20 times, refer you to the Bates numbers in the bottom
	21 A I don't recall, actually.		21 right-hand corner of the documents.
	22 Q Okay. Now you see to the left on the first		22 A No, problem.
	23 page here, No. 5 says "Chief Executive Officer."		23 Q So am I correct that this is another Statement
	24 Do you see that?		24 of Information?
10:06:12	25 A Yes, I do.	10:08:02	25 A Um, yes, it is.

Page 14			Page 16		
10:08:05	1	Q Okay. The date on the top right says August	10:09:53	1	A Yeah. He was initially done, and then I think
	2	25th, 2017.		2	a couple of weeks later he was removed.
	3	Do you see that?		3	Q Okay. And do you know who the agent of service
	4	A Yes, sir.		4	of process became when he was removed?
10:08:14	5	Q Now, on the bottom right there's a place for	10:10:02	5	A Either myself or Majid, probably.
	6	your signature.		6	Q Okay.
	7	Do you see that?		7	A I don't know exactly, but either myself of
	8	A Uh-huh. Yes, I do.		8	Majid.
	9	Q And this does not appear to have been signed;		9	Q Okay. Now, if I can direct you to the page at
10:08:23	10	is that correct?	10:10:15	10	the Exhibit Bates No. 7?
	11	A That is correct.		11	A Okay.
	12	Q Do you know whether you -- there ever came a		12	Q Now, do you agree with me that the pages Bates
	13	point in time when you signed this document?		13	No. 7 through 13 consists of the bylaws for Integrated
	14	A I don't have any recollection of this.		14	Administration?
10:08:30	15	Q Okay. Did you draft this document?	10:10:38	15	A Yes.
	16	A Um, no. I don't think so.		16	Q Do you know if these bylaws were issued at the
	17	Q Do you know if someone did on your behalf?		17	time the company was formed, in or around August 201?
	18	A I don't know anything about this document.		18	A I don't know.
	19	Q You haven't seen this before?		19	Q Okay. If I can refer you to the next page, 14,
10:08:45	20	A I don't think so.	10:11:03	20	and this is the Certificate of Secretary of Integrated
	21	Q Okay.		21	Administration.
	22	A If I have, I don't recall.		22	Do you see that?
	23	Q Okay. Was it your understanding that a		23	A Yes, I do.
	24	Statement of Information needed to be filed in 2017?		24	Q Okay. And that's your signature there?
10:08:55	25	A I -- I think I get something in the mail that	10:11:11	25	A Yes, sir.
Page 15			Page 17		
10:08:58	1	says, you know, you have to file this. I don't know if	10:11:11	1	Q Okay. And was this, as you understood, another
	2	this is something that came in the mail. I don't know.		2	document that was necessary to establish the company?
	3	There's a service that sends them out, and I don't know.		3	A Yes, sir.
	4	Q Okay. And if you can turn to page 3, it's the		4	Q Okay. And the next page, 15.
10:09:08	5	document that's Bates numbered 28.	10:11:20	5	A I don't know if this was necessary to establish
	6	A Yes, sir.		6	the company, but this is part of the corporate
	7	Q Do you see that? And this page consists of the		7	documents. I don't know specifically what the
	8	Articles of Incorporation for Integrated Administration;		8	requirements to establish a company are.
	9	is that correct?		9	Q Okay. Okay. And the next page, 15?
10:09:20	10	A That is correct.	10:11:31	10	A Okay.
	11	Q Okay. So this was another document you filed		11	Q This page is entitled, "The resolutions adopted
	12	for the purposes forming the company?		12	by the incorporator of Integrated Administration."
	13	A That is correct.		13	A Okay.
	14	Q Now, if I could direct you to No. 3, it states,		14	Q And if I can direct you to the -- toward the
10:09:30	15	"The name and address and the state of the corporation's	10:11:42	15	bottom right, there's an individual identified as Arial
	16	initial agent for service of process is," and then		16	C. Ayaay --
	17	there's an individual listed there. It's -- I'm not		17	A Uh-huh.
	18	sure if I'm pronouncing this correctly, but Homoyan		18	Q -- incorporator.
	19	Forman (sic)?		19	Do you see that?
10:09:42	20	A Houmayoon Poormand, yes.	10:11:52	20	A Yes, I do.
	21	Q Okay. Now, who is that individual?		21	Q Who is that?
	22	A He's my uncle.		22	A Probably the service that was used to set up
	23	Q He's your uncle. Okay. So you were designated		23	the company. I don't know who that person is, but
	24	him -- designating him as the agent for service of		24	that's what would I guess based on this document.
10:09:52	25	process for Integrated Administration?	10:12:00	25	Q Okay. And this document isn't signed?

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10:12:03	1	A This document is not signed.	10:14:20	1	the notice of annual meeting minutes. That was part of
	2	Q Okay. If you turn to page 19?		2	23; is that correct?
	3	A Yes, sir. Page 19 or stamp 19?		3	A Yes.
	4	Q Stamp 19?		4	Q Okay. And on page 24 --
10:12:18	5	A Okay. Great. Yes, sir.	10:14:34	5	A Yes.
	6	Q Now this document identifies K.Jam Media, Inc.		6	Q -- the document's entitled "Minutes of Annual
	7	as owning 100 shares of Integrated Administration; is		7	Meeting of Board of Directors of Integrated
	8	that correct?		8	Administration."
	9	A Yes, it does.		9	Do you see that?
10:12:33	10	Q Now, is it your understanding K.Jam Media, Inc.	10:14:41	10	A Yes, I do.
	11	owned all of the shares of Integrated Administration?		11	Q And that's your signature on that page?
	12	A Yes, sir.		12	A Yes, it is.
	13	Q Okay. And K.Jam Media, Inc. is another one of		13	Q Okay. Now yesterday you reviewed with
	14	your companies?		14	Mr. Walker various corporate documents for K.Jam Media.
10:12:43	15	A Yes, sir.	10:14:57	15	Do you recall that?
	16	Q Okay. And you're the -- are the sole owner of		16	A Yes, I do.
	17	K.Jam Media, Inc.?		17	Q Okay. So now we've seen corporate formation
	18	A Yes, sir.		18	documents for another one of your companies, Integrated
	19	Q You own all the shares of that company?		19	Administration; is that correct?
10:12:52	20	A Yes, sir.	10:15:06	20	A Yes, you have.
	21	Q Okay. And if I could direct you to the page		21	Q Okay. So as with K.Jam Media, at the time you
	22	Bates No. 21?		22	established Integrated Administration, you were familiar
	23	A Yes, sir.		23	with the fact that companies had officers --
	24	Q The name of this document is "Minutes of first		24	A Yes.
10:13:22	25	meeting of stockholders of Integrated Administration.	10:15:17	25	Q -- is that correct? Okay.
Page 19			Page 21		
10:13:24	1	Do you see that?	10:15:17	1	And you were familiar with and had personal
	2	A Yes, I do.		2	experience with signing legal documents in connection
	3	Q Okay. And was it your understanding that		3	with companies?
	4	Integrated Administration -- well, strike that.		4	A A few. If these are legal documents, yes.
10:13:37	5	Is it your signature on page 22 of this	10:15:27	5	Q Okay. Did you understand them to be legal
	6	document?		6	documents when you signed them?
	7	A Yes, it is, sir.		7	A I just knew them to be, you know, requirements
	8	Q Okay. And following that, on page 23, you'll		8	to start a company.
	9	see a document that's entitled "Waiver of Notice of		9	Q Okay. And you were familiar with designated
10:13:51	10	Annual Meeting of Board of Directors of Integrated	10:15:35	10	agents for service of process for companies?
	11	Administration"?		11	A Yes.
	12	A Yes, sir.		12	Q Okay. And you had personal experience with all
	13	Q Do you see that?		13	of these things?
	14	A Yes, I do.		14	A Yes. I know what a designated agent is.
10:13:55	15	Q And that's your signature on that page?	10:15:46	15	Q Okay. Now is Integrated Administration still
	16	A Yes, sir.		16	in existence?
	17	Q Okay. What was your understanding regarding		17	A No. I shut it down awhile ago, a year ago,
	18	annual meeting -- meeting minutes for Integrated		18	something like that. I don't remember when.
	19	Administration?		19	Q Okay. What prompted you to shut it down.
10:14:04	20	A Uh, that it's just a corporate formality.	10:16:00	20	A It was inactive for years and then I finally
	21	Q Okay. And you needed to account for that every		21	shut it down.
	22	year?		22	Q Okay. When was the last time it was active?
	23	A I believe so. I don't know specifically, but I		23	A I don't remember specifically when I shut it
	24	believe so.		24	down, but it was probably a year and a half ago, a year
10:14:15	25	Q Okay. So we see for 2011 there was a waiver of	10:16:12	25	ago, something like that. Maybe two years ago.

Page 22			Page 24		
10:16:14	1	Q That's when it stopped doing business?	10:18:07	1	the time that, as you testified to yesterday, things
	2	A No, that's when I shut it down.		2	went south with Mr. Bergstein?
	3	Q Okay. When did it -- when did it stop doing		3	A Yeah. That's when the businesses that --
	4	business?		4	that's when, you know, um, it just -- we -- we -- the --
10:16:19	5	A It stopped doing business when kind of the work	10:18:17	5	the nature of the business changed. David and I weren't
	6	that it was doing for Sovrin and the other entities came		6	working together anymore, the employees at Sovrin were
	7	to end.		7	no longer employees, and I think I had gone off on my
	8	Q Okay. And approximately when was that?		8	own at that point, so the operation was just me and my,
	9	A I don't remember years. A couple years ago,		9	um, my assistant and -- and whatnot.
10:16:33	10	five, six years ago, seven years ago. I don't know	10:18:37	10	Q Okay. What do you mean by "the nature of
	11	exactly.		11	business changed"?
	12	Q Okay. Would you say 2012?		12	A Well, Sovrin stopped working, and so there was
	13	A I don't know when. Somewhere --		13	no need for this company anymore because those employees
	14	Q Okay.		14	were no longer employees, so I stopped using it. Those
10:16:41	15	A -- in that neighborhood.	10:18:51	15	guys were no longer employees.
	16	Q Between 2012, 2013? Does that sound right?		16	Q Okay. And is -- is it your testimony that the
	17	A As I said, I don't know. Somewhere in that		17	only business that Integrated Administration was doing
	18	neighborhood.		18	was with Sovrin?
	19	Q Okay.		19	A No, that's not what I said. I just used that
10:16:46	20	A I don't know off the top of my head.	10:19:03	20	as an example.
	21	Q Now if you could turn the last page of what's		21	Q Okay. So were other entities that -- with
	22	been marked as Exhibit 2.		22	which or --
	23	Are you able to tell me what this is?		23	A There were other people that were on the --
	24	A Certificate of Dissolution.		24	Q Let me just finish.
10:17:04	25	Q Okay. And what do you understand that to be?	10:19:09	25	A Oh, I'm sorry.
Page 23			Page 25		
10:17:05	1	A This is how I shut the company down.	10:19:09	1	Q Were there other entities with which Integrated
	2	Q Okay. So I'm correct that there was a time		2	Administration stopped doing business around that time?
	3	period of several years during which the company was not		3	A There was employees that were working on many
	4	conducting business, but it was still an operating		4	other projects, and they ceased to become employees at
10:17:19	5	entity?	10:19:20	5	that time, so --
	6	A Yes. Well, operating entity meaning I just		6	Q And this was -- this was all around the time
	7	paid the \$800 a year.		7	that things went south with Mr. Bergstein?
	8	Q It was still in existence?		8	A It was right around the time that, um -- I
	9	A Yes.		9	don't know necessarily it was around time that things
10:17:26	10	Q Okay. And is there something particular -- in	10:19:32	10	went south, but it was right around the time where the
	11	particular that prompted you to file a Certificate of		11	nature of what David was doing, vis-a-vis Integrated
	12	Dissolution?		12	Administration, changed.
	13	A No, I just was -- you know, I think there		13	Q All right. And what exactly was your
	14	was -- one of the reasons I had kept it open was there		14	understanding of what David was doing with Integrated
10:17:38	15	was some -- the investigations and -- and potential	10:19:47	15	Administration at that time?
	16	litigation that was going on. Once that all got settled		16	A David was doing deals, working on many
	17	and went away, I didn't want to pay the \$800 a year, an		17	transactions. He was the guy who was the primary funder
	18	keep records and corporate documents, so I instructed		18	of Integrated Administration. He was arranging funding
	19	Majid to shut it down.		19	to pay for people. He would advance expenses for deals
10:17:54	20	Q Okay.		20	and then get paid back if he had advanced deals. He
	21	A And he's told me what to do and how to do it,	10:20:01	21	then set up another company called Cyrano, which I spoke
	22	and I shut the company down.		22	to you about yesterday. And the people that worked
	23	Q Now, is it fair to say that at the -- that the		23	closely with him went on Cyrano payroll and started
	24	time -- at the time that Integrated Administration		24	working at that company, and I had -- I was not a part
10:18:03	25	stopped conducting business was, was that at or around	10:20:17	25	of that company officially.

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10:20:21	1	Q So it's your position is that Mr. Bergstein was	10:22:36	1	A Yes, I do. Thank you.
	2	doing all of that for your company, Integrated		2	Q Okay. And the money that was transferred to
	3	Administration?		3	Swartz IP, that was referred to pursuant to the note
	4	A He was doing that for IA, yes.		4	purchase agreement that you signed on behalf Swartz IP
10:20:30	5	Q Okay. Now, if I could direct you back to page	10:22:47	5	in your capacity as Swartz IP's vice-president; is that
	6	43 of Exhibit 1.		6	correct?
	7	A Okay.		7	A I understand that that document was
	8	Q I'm sorry, Exhibit 2.		8	instrumental in the transfer. He -- your colleague made
	9	Is that your signature on bottom there?		9	that clear yesterday.
10:20:41	10	A Yes, it is.	10:22:57	10	Q Okay. And are you aware that Integrated
	11	Q And you signed this on or about July 1st, 2018?		11	Administration received more than \$2 million in payments
	12	A Yes, sir.		12	from Swartz IP in connection with this transaction with
	13	Q And you signed it under the penalty of perjury?		13	Class TT?
	14	A Yes, sir.		14	A Yesterday your colleague pointed out
10:20:49	15	Q Okay. So is everything in this document true	10:23:08	15	transactions that were slightly north of a million, and
	16	and accurate to the best of your knowledge?		16	I'm sure there are other transfers, but I don't recall
	17	A Yes, sir.		17	any of those tracks specifically.
	18	Q Okay. And let's look at, um, Section 5 of this		18	Q Okay. I'm going to show you what was
	19	document entitled "Required Statements."		19	previously marked as Exhibit 40 in connection with
10:21:11	20	Do you see that?	10:23:25	20	Mr. Majid Zarrinkelk's deposition.
	21	A Yes, I do.		21	A Okay. Do we need to share?
	22	Q Okay. Has Integrated Administration been		22	MR. LATZER: Yes, I -- I don't have another
	23	completely wound up and dissolved?		23	copy of it.
	24	A As -- I think this was the last thing to do		24	MR. MIGLER: No problem.
10:21:21	25	that, yeah.		25	///
Page 27			Page 29		
10:21:22	1	Q Okay. And as of the time that you signed this	10:23:41	1	BY MR. LATZER:
	2	document, had all final returns required under the		2	Q And I'm going to direct you to a particular
	3	California Revenue and Taxation Code been filed or were		3	transaction, but are you able to tell me, generally,
	4	to be filed with the California Franchise Tax Board?		4	what this is?
10:21:37	5	A I believe so.	10:23:48	5	A It's a Wells Fargo Bank statement for
	6	Q And had the known assets of Integrated		6	Integrated Administration, August 11th to August 24th of
	7	Administration had been distributed to persons entitled		7	2011.
	8	to them, or to the corporation, or had the corporation		8	Q Okay. So this exhibit consists of additional
	9	acquired no known assets?		9	bank statements as well.
10:21:47	10	A Um, I believe so. I don't know what assets I	10:24:04	10	Do you see on --
	11	would have had.		11	A Yes, I see that.
	12	Q Okay. As far -- you knew that -- did IA have		12	Q Okay. And to -- just to narrow our focus here,
	13	any assets at time it was dissolved?		13	do you see on the top right of the first page there it
	14	A Um, I don't think so.		14	says, "Page 2 of 127"?
10:22:01	15	Q Okay. Now yesterday, with Mr. Walker, you	10:24:22	15	A I do.
	16	discussed a transaction which the plaintiff in this		16	Q So I'm going to refer to those page numbers
	17	matter, Class TT, transferred to Swartz IP,		17	when we look at this document.
	18	\$17.7 million.		18	A Okay. No problem.
	19	Do you recall that?		19	Q And -- and you agree with me that these are
10:22:24	20	A Yes, I do.	10:24:28	20	bank statements for Integrated Administration's account
	21	Q Okay. And just to be clear, by Swartz IP, I'm		21	ending in 12578? And the first statement is, as you've
	22	referring to both Swartz IP Services Group and Advisory		22	described before, for the period of time between
	23	IP Services.		23	August 11th, 2011 and August 24th, 2011?
	24	A Okay.		24	A I do.
10:22:34	25	Q Do you understand that?	10:24:42	25	Q Okay. And the last statement in this exhibit

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10:24:45	1 is from --	10:27:16	1 things. I don't know specifically what was it doing. I
	2 A March 1st to March 31st, 2014.		2 did not form it. I did not run. I don't know
	3 Q Okay. Thank you.		3 specifically what it was set up to do.
	4 Okay. Let's take a look at page 17.		4 Q Okay. But Integrated Administration was your
10:25:07	5 A Okay. No problem.	10:27:25	5 company?
	6 Q Before I direct you to a particular		6 A That is correct.
	7 transaction, were you a signatory for this account?		7 Q Okay. So when this payment of \$150,000 hit
	8 A Yes, I was.		8 Integrated Administration's bank account on
	9 Q Okay. Did you establish this account?		9 November 23rd, 2011, did you question where it came from
10:25:21	10 A Yes. Either Majid or I did.	10:27:39	10 or why you were receiving it?
	11 Q Okay.		11 A I would -- David would be funding the company.
	12 A Majid would typically open the bank accounts.		12 You will see a lot of wires that came in that he
	13 Q Okay. Now, on page 17, I want to direct you to		13 arranged. I would tell what him the company's financial
	14 the transaction at the bottom 11/23.		14 needs were in terms of how much was needed for payroll,
10:25:35	15 A Okay.	10:27:51	15 for bills, for rent, for phones, et cetera, and he would
	16 Q It's the first of the transactions dated 11/23.		16 arrange money to come in. And I would ask him what the
	17 A Okay.		17 money was, and how it should be logged, and that was our
	18 Q And it reflects a deposit into Administrate --		18 routine. It was my routine.
	19 into Integrated Administration's account for \$150,000		19 Q But it's your testimony that you're not aware
10:25:52	20 from Swartz IP Services Group, Inc.	10:28:03	20 of any, goods or services that Integrated Administration
	21 Do you see that?		21 provided Swartz IP in exchange for this payment?
	22 A I do.		22 A No, that's not what I said. What I said is, I
	23 Q What was this payment from Swartz IP to		23 don't know what David was doing with them. Maybe David
	24 Integrated for?		24 was providing the goods and services for them, maybe he
10:25:59	25 A I do not have any recollection about any of	10:28:21	25 was consulting for them, maybe he was working on deals.
Page 31		Page 33	
10:26:02	1 these individual transactions from back then.	10:28:21	1 I don't know what he was doing.
	2 Q Okay. Do you know if Integrated Administration		2 Q But you're not aware one way or the other?
	3 provided any goods or services to Swartz IP Services?		3 A I'm not aware of what he was doing.
	4 A Integrated Administration had 40 employees. I		4 Q Okay.
10:26:21	5 don't know in, on, or around this time, and David was	10:28:31	5 A I'm not aware of what he was doing.
	6 doing a lot of work with and Jerry Swartz, and I don't		6 Q Okay. Are you aware of whether Integrated
	7 know what David was or wasn't doing. Whatever he was		7 Administration issued an invoice related to this payment
	8 doing, as far as I'm concerned, he was doing stuff for a		8 from Swartz IP?
	9 multitude of companies, potentially including Swartz IP.		9 A There were some invoices issued. I don't
10:26:35	10 So that's my thought.	10:28:52	10 remember specifically what for, or how many, or when.
	11 Q Okay. Do you know if any of Integrated		11 Q Okay. Are you aware of any documents relating
	12 Administration's 40 employees were doing work for Swartz		12 to the purpose or reason why this \$150,000 was paid from
	13 IP?		13 Swartz IP to Integrated Administration?
	14 A I don't know what a lot of the employees were		14 A I don't know what David had with Swartz IP.
10:26:48	15 doing. I could tell you that there were 40 employees.	10:29:08	15 Maybe it's something that he did. He had paperwork. He
	16 Some were housed, not with us, at other places working		16 made a deal with them. I don't know the answer to that.
	17 on the medical billing. So the medical billing was a		17 Q Okay. Let's turn to the next page, page 18.
	18 business that uh, um, uh, was -- had a bunch of		18 A Okay.
	19 employees, and there was other things that David was		19 Q And the first transaction dated November 29,
10:27:02	20 doing. I don't what some of David's people were working	10:29:19	20 2011.
	21 on. Maybe they were working on things for Swartz IP. I		21 Do you see that?
	22 don't know.		22 A Yes, I do.
	23 Q Okay. But did -- you understood that Swartz IP		23 Q And that's another payment from Swartz IP
	24 was not a medical billing; did you?		24 Services Group to Integrated Administration.
10:27:15	25 A Swartz IP was a company that was funding	10:29:26	25 Do you agree with me?

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10:29:27 1 A I do.
 2 Q Okay. And do you have an understanding as to
 3 why this payment was made?
 4 A No. No. I talked about this yesterday to the
 10:29:37 5 same statement I made yesterday.
 6 Q Okay. And is it the same statement that you
 7 just made to me before, and that's that you really don't
 8 know one way or the other why this payment was made or
 9 whether -- strike that.
 10:29:50 10 You really don't know one way or the other
 11 whether Integrated Administration provided any goods or
 12 services to Swartz IP in exchange for this payment?
 13 A What I know is that David would fund IA, and
 14 I'll say that again. I've said it a few times. David
 10:30:05 15 would arrange funding to come in to IA for the work IA
 16 was doing. I was not involved in where the money would
 17 come from, or how the money would come in. He would
 18 arrange the wires, as you see. The wires would come in
 19 and he would tell me what to do with the money.
 10:30:20 20 Q And you would do as he told you?
 21 A Yes.
 22 Q Okay. Did you ask any questions?
 23 A I would ask how to classify it so that I could
 24 keep our books and records clean.
 10:30:30 25 Q Did you ask any questions as to the source of

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10:31:52 1 A As David was funding the company, he was
 2 arranging the funding. Jerry Swartz was a friend of
 3 his. They were doing a whole bunch of deals together.
 4 I don't know what specifically what he was doing. And I
 10:32:02 5 would tell him how much money was needed, and he would
 6 fund what he could when he could, and tell me what to do
 7 with the funding.
 8 Q Okay. And the same is true for the
 9 February 9th, 2012 transfer?
 10:32:13 10 A That is correct.
 11 Q Okay. If you could turn to page 36.
 12 A Okay.
 13 Q Now, on page 36, I want to focus your attention
 14 on two transactions dated March 6, 2012. The first one
 10:33:23 15 is \$63,167.
 16 A 157, right -- 38, or whatever.
 17 Q I think it's \$167.36.
 18 A Okay.
 19 Q Do you see that one?
 10:33:37 20 A I do.
 21 Q And the entry states, in part, "Online transfer
 22 to business checking account from IA to ZKCO for wire to
 23 Carol Watson."
 24 A Okay.
 10:33:49 25 Q Do you see that?

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10:30:33 1 the funds?
 2 A I would typically just -- I would ask him for
 3 information on it, but typically wanted to know where it
 4 was income or not, and how to classify it so that Majid
 10:30:39 5 can file my taxes properly.
 6 Q Were you curious as to the source of the funds?
 7 A No. At the time, I had no reason to question
 8 it.
 9 Q Okay. Let's turn to page 31, please.
 10:31:14 10 A Okay.
 11 Q And I want to direct you to two transactions on
 12 this page, February 2nd, 2012 and February 9, 2012.
 13 Do you see the --
 14 A Okay. I do.
 10:31:28 15 Q -- the first transaction for February 2nd,
 16 2012, it's a transfer from Swartz IP Services Group to
 17 Integrated Administration, \$50,000?
 18 A I see that, yes.
 19 Q Okay. And do you have any understanding as to
 10:31:42 20 why Swartz IP was sending this money to Integrated
 21 Administration?
 22 A The -- the same thing, as I said before. I'm
 23 going to say the same thing about every single one of
 24 these transactions.
 10:31:52 25 Q Okay.

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10:33:50 1 A Yes, I do.
 2 Q Now, do you have an understanding as
 3 to -- strike that.
 4 ZKCO is Mr. Zarrinkelk's firm, or was his firm?
 10:34:03 5 A Yes. Yes.
 6 Q Okay. Do you have an understanding as to why
 7 Integrated Administration was using Mr. Zarrinkelk's
 8 firm in this instance to facilitate the transfer to the
 9 Carol Watson?
 10:34:16 10 A That's how wires would -- would be done. I
 11 would send him an e-mail for a wire that needed to go
 12 out, and he would move the funds because he could wire
 13 from his own account online so I wouldn't have to drive
 14 to the branch and fill out a form. So he would move it
 10:34:28 15 to his account, and from his account wire it to wherever
 16 he was instructed to do so.
 17 Q Okay. So he would, in -- in certain instances,
 18 facilitate these wires for you?
 19 A That is correct.
 10:34:38 20 Q Okay.
 21 A If not, I would have to go to the branch.
 22 Are you done with this one?
 23 Q Yeah. Okay. Let me show you what I've marked
 24 as Exhibit 3.
 10:35:10 25 (Exhibit 3 was marked for

Page 38		Page 40	
10:35:10	1 identification by the Court Reporter 2 and is attached hereto.) 3 BY MR. LATZER: 4 Q Are you able tell me what this document is?	10:37:59	1 on February 9th -- 2 A I do. 3 Q -- a transfer from Swartz IP for \$150,000 to 4 Integrated Administration.
10:35:24	5 A It's a list of wire transfers, Pineboard and IA 6 from Wells Fargo, and the second page is IA transfers 7 and dates. 8 Q Okay. Now this is a document that Integration 9 Administration produced in discovery in this case. It's	10:38:06	5 A I do. 6 Q And that's also reflected on Exhibit 3? 7 A It is. 8 Q Okay. And if you turn to page 36, please, the 9 first transaction at the top of --
10:35:49	10 Bates numbered 1756 to 1757; is that correct? 11 A Yes, sir. 12 Q Okay. Now, is this -- well, who put this 13 document together? 14 A I don't remember.	10:38:43	10 A I see it. 11 Q -- the first page reflects a \$300,000 payment 12 from Swartz IP to Integrated Administration. 13 A I see it. 14 Q Okay. And that's also reflected on this
10:36:04	15 Q Okay. Is this one of Integrated 16 Administration's records? 17 A I don't know what it is. 18 Q Have you ever seen this document before? 19 A I don't remember. Maybe.	10:38:52	15 document that's been marked as Exhibit 3. 16 A That's it. 17 Q Okay. So do you agree with me that this 18 appears to reflect the various transfers of monies 19 that --
10:36:15	20 Q Do you agree with me that this reflects the 21 transfers of monies from Swartz IP to Integrated 22 Administration? 23 A It says "Pineboard funding," so no. But you -- 24 we just went through some wire numbers together a minute	10:39:02	20 A Yes, I do. 21 Q -- Integrated Administration received from 22 Swartz IP? 23 A According to the first few that we have look 24 at, yes.
10:36:33	25 ago. There's a \$300,000, a 150,000, so it could be. I	10:39:08	25 Q Okay. And was it your understanding that the
Page 39		Page 41	
10:36:37	1 don't know. 2 Q Okay. Well, let's take a look. If you can 3 turn back to what was marked as Exhibit 40 of 4 Zarrinkelk's deposition.	10:39:13	1 purposes of the payments from Swartz IP to Integrated 2 Administration were for Pineboard funding? 3 A This is probably the -- uh, what David had told 4 us to log it as. That's what I think this would be, but
10:36:47	5 A Got it. 6 Q And if we can look back at page 17. 7 A Okay. 8 Q Do you see a \$150,000 transfer from Swartz IP 9 to Integrated Administration?	10:39:29	5 I don't know. 6 Q Okay. And what did you understand that to 7 mean, Pineboard funding? 8 A What David told me to write in there, and then 9 hopefully later on he would have expanded or explained
10:37:07	10 A I do. 11 Q And this document that we've marked today as 12 Exhibit 3, reflects a \$150,000 transfer -- 13 A It does. 14 Q -- from -- or to Integrated Administration.	10:39:40	10 it. 11 Q Okay. So these were placeholders for you? 12 A I don't know who -- I don't know what this 13 document is. I don't know who created it. I don't when 14 it was created, so I don't -- I'm not prepared to answer
10:37:19	15 A It does. 16 Q Do you see that? 17 A I do. 18 Q Okay. And let's look at page 18. 19 Do you see that on 11/29/2012, there was a	10:39:53	15 that. 16 Q Okay. But it is a document that you produced 17 in discovery? 18 A Okay. 19 Q Do you disagree with that?
10:37:30	20 \$300,000 transfer? 21 A I do. 22 Q Okay. And that's also reflected on what's been 23 marked as Exhibit 3? 24 A It is.	10:39:59	20 A No. 21 Q Okay. 22 A If you say I produced it, I believe you. 23 Q Do you know how you would have come into 24 possession of this document?
10:37:37	25 Q Okay. And if you look at page 31, you'll see	10:40:05	25 A No. I have no recollection of that.

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10:40:08	1 Q Okay. Now did there come a point in time where	10:42:21	1 the ones on the first page? I don't understand these to
	2 you developed an understanding as to what "Pineboard		2 be that. This is just a document, so there were
	3 funding" meant?		3 transfers on that date.
	4 A I don't remember.		4 Q Okay. Do you know if this is a document that
10:40:27	5 Q Okay. As you sit here today, do you have an	10:42:34	5 Mr. Zarrinkelk put together?
	6 understanding of what it meant?		6 A I don't know who put this together. I don't
	7 A Funding from Pineboard -		7 recall.
	8 Q Okay.		8 Put this away?
	9 A -- or related to Pineboard somehow.		9 Q Yes.
10:40:34	10 Q Now you testified yesterday that Pineboard	10:42:53	10 A This one, too?
	11 Holdings was set up as an investment vehicle; is that		11 Q You can put that away, too.
	12 correct?		12 I'm showing you Exhibit 4.
	13 A Yes, that's my understanding.		13 (Exhibit 4 was marked for
	14 Q Okay. And you were an officer at Pineboard --		14 identification by the Court Reporter
10:40:44	15 board Holdings?	10:42:59	15 and is attached hereto.)
	16 A Yes. Yes		16 BY MR. LATZER:
	17 Q And what sort of investments did Pineboard		17 Q And this is an e-mail dated November 17, 2011,
	18 make?		18 from you to Ray Shahab and Mr. Zarrinkelk?
	19 A Pineboard was funded, I think, by the Weston		19 A Yes.
10:40:52	20 guys. They -- they funded that, and they would instruct	10:43:13	20 Q Do you see that?
	21 us what to do with the money, they and David.		21 A I do.
	22 Q Okay. So let me ask it again.		22 Q Okay. And Mr. Shahab, I believe you testified
	23 What sort of investments it made?		23 yesterday, was an employee of Mr. Zarrinkelk?
	24 A I don't remember what Pineboard did		24 A That's correct.
10:41:02	25 specifically besides they did a bunch of work for	10:43:19	25 Q And he lost his CPA license because he
Page 43		Page 45	
10:41:02	1 Sovrin, medical billing. They looked at other deals.	10:43:22	1 embezzled client monies; is that correct?
	2 David and the Weston guys were in touch all the time.		2 A I -- I don't know what he did. I know he did
	3 They were doing insurance stuff. They were doing all		3 something that was not cool, and Majid reported him,
	4 kinds of stuff that I don't know.		4 and, I believe, took his license away.
10:41:17	5 Q Okay. Do you know whether Pineboard provided	10:43:33	5 Q Okay. And Mr. Zarrinkelk, you characterized
	6 any goods or services to Swartz IP?		6 him as a friend, family member, accountant, business
	7 A I don't know what David and the Weston guys		7 manager?
	8 were doing vis-a-vis Swartz IP. I was an officer at		8 A Yes.
	9 Pineboard because I was the guy in the office that could		9 Q All of those things?
10:41:36	10 sit there and -- and administer it. Whatever needed to	10:43:40	10 A Yes, sir.
	11 be administered.		11 Q Okay.
	12 Q It you could turn to page 2 of this Exhibit 3.		12 A He's a great great guy.
	13 A Okay.		13 Q Subject of this e-mail that you wrote is
	14 Q And this reflects a transfer of funds to		14 "cash."
10:41:54	15 Integrated Administration on December 8th, 2011 for	10:43:47	15 Do you see that?
	16 \$250,000.		16 A I do.
	17 Do you see that?		17 Q Okay. What did that mean?
	18 A I do.		18 A Had to do with money.
	19 Q And another transfer on January 9th, 2012, to		19 Q Okay. And the first line of the body of the
10:42:04	20 Integrated Administration for \$30,000.	10:44:08	20 e-mail you write, "There has been a wire for \$290,000
	21 Do you see that?		21 sent to Integrated Administration. It will hit
	22 A I do.		22 tomorrow."
	23 Q Okay. Do you understand that these were, as we		23 Do you see that?
	24 saw in the first page, transfers from Swartz IP?		24 A Yes, I do.
10:42:17	25 A Uh, I -- I don't. But are these the same as	10:44:17	25 Q Okay. And did you have an understanding at the

Page 46		Page 48	
10:44:19	1 time of the source of this \$290,000 that was coming into	10:46:41	1 (Exhibit 5 was marked for
	2 your company?		2 identification by the Court Reporter
	3 A I don't recall, but I don't think so.		3 and is attached hereto.)
	4 Q Okay. And the e-mail continues, "Please do the		4 BY MR. LATZER:
10:44:31	5 following. Leave 47,500 of the wire in IA and transfer	10:46:42	5 Q And this is a November 23rd, 2011 e-mail from
	6 the balance of 204,500 to KJM immediately."		6 you to Mr. Bergstein; is that correct?
	7 Did I read that correctly?		7 A Yes, sir.
	8 A Yes, you did.		8 Q And the first line of the e-mail you write,
	9 Q Okay. And KJM is K.Jam Media?		9 "Buzz when you can. Please have a Q re the G for you."
10:44:50	10 A Yes, sir.	10:47:02	10 Did I read that correctly?
	11 Q And that's your company?		11 A You did.
	12 A We've established that.		12 Q Okay. What did you mean by "a Q re the G for
	13 Q Okay. And so you're directing your accountant		13 you"?
	14 to transfer \$242,500 of these \$290,000 that were sent to		14 A I have a question regarding the G. I don't
10:45:05	15 IA to K.Jam Media?	10:47:12	15 know what I was referring to about the G," but I say,
	16 A Correct.		16 buzz me when you can. I have a question regarding the
	17 Q Okay. And then if you continue down, let's		17 for whatever for you.
	18 continue with the parenthetical there. It says, "The 47		18 Q Your testimony is you don't what you meant by
	19 in IA will cover payroll and taxes as well as the		19 "the G"?
10:45:24	20 warehouse folks and Jeff Solomon. I will send you a	10:47:21	20 A I don't.
	21 detailed breakdown tomorrow."		21 Q Okay.
	22 Did I read that correctly?		22 A Let me keep reading. Maybe it will refresh my
	23 A Yes, you did.		23 memory.
	24 Q Okay. And Jeff Solomon is a reference to a		24 Q Sure.
10:45:34	25 gentleman who's -- I believe you described yesterday as	10:47:36	25 A Well, this was the kind e-mail I was referring
Page 47		Page 49	
10:45:35	1 an attorney of yours?	10:47:38	1 to yesterday when your colleague was asking, are there
	2 A He was working at IA at the time. Yes, he is		2 any e-mails about this. This is exactly the kind of
	3 an attorney.		3 e-mail I was talking about.
	4 Q Okay. And is he also a friend of yours?		4 Q Do you have an understanding from reviewing the
10:45:42	5 A Yes, he is.	10:47:48	5 e-mail in its entirety what you meant by "the G"?
	6 Q Okay. And the e-mail continues, "Once the		6 A I don't.
	7 242,500 is in KJM, I will need you to make an online		7 Q Okay. Let's look at the second line. "Please
	8 transfer of 13,327 to Pagoda. I need to send a wire		8 also look at the Steve O docs this weekend."
	9 tomorrow for that amount."		9 Do you see that?
10:45:59	10 Do you see that?	10:47:56	10 A Yes.
	11 A Yes.		11 Q Do you know what you meant by "Steve O docs"?
	12 Q I read that correctly?		12 A Yes. Steve O docs, there was an animation
	13 A Yes, you did.		13 studio we were looking at. There was a business plan we
	14 Q Okay. And Pagoda is another one of your		14 were looking at for the -- for this project that was
10:46:05	15 companies; correct?	10:48:07	15 headed by a gentleman named Steve Oedeker, who's a
	16 A Yes, it was another company.		16 director, filmmaker and friend of mine. We met with him
	17 Q Okay. And you're -- you were an officer of		17 on a number of occasions to do a deal with him.
	18 that company?		18 Q Okay. Did anything become of that?
	19 A Yes.		19 A Not yet.
10:46:11	20 Q Okay. Were you the sole owner of that company?	10:48:20	20 Q That's still ongoing?
	21 A I don't remember. I don't think so. I don't		21 A I still believe in it. I'm still trying.
	22 know.		22 Q Okay. Was Mr. Bergstein involved in that at
	23 Q Okay.		23 all?
	24 A I don't remember.		24 A No, sir.
10:46:32	25 Q Let's look at what I've marked as Exhibit 5.	10:48:32	25 Q The e-mail that you wrote continues, "In order

Page 50		Page 52	
10:48:34	1 to catch up next week, we will need 175. This will be	10:50:35	1 A Yes, I do.
	2 payroll, the outstanding bills, rent, medical insurance,	2	Q Does that refer to your landscaping and
	3 parking, et cetera, Amex, the landscaping and the	3	antiques?
	4 antiques, and 50 to my loan."	4	A No, sir.
10:48:51	5 Do you see that?	10:50:38	5 Q What's that a reference to?
	6 A Yes, I do.	6	A Probably his charges on the Amex. I wanted to
	7 Q I read that correctly?	7	let him know what I was referring to. What the charges
	8 A Yes, you did.	8	were.
	9 Q Now, did you understand or -- strike that.	9	Q Okay. And then the "50 to my loan," what are
10:48:56	10 Were you discussing Integrated Administration	10:50:47	10 you referring to there?
	11 in this context?	11	A I had -- I would loan the company money to the
	12 A No. I was telling him how much money we needed	12	extent that the company needed it when there was no
	13 to pay our bills.	13	money in. I would -- I had arranged loans from people
	14 Q Okay. And were you going to pay those bills	14	like Majid a number of times, and also with myself, take
10:49:05	15 from Integrated Administration's account?	10:50:55	15 cash advances on my credit card, or whatever I needed to
	16 A Some from IA, some from -- from K.Jam Media,	16	do, to make sure payroll, and medical insurance, and
	17 depending on what the bill was. The lease was this	17	parking, and things like that were met.
	18 K.Jam Media's name, so the lease would typically go from	18	Q Okay. And you said you --
	19 K.Jam Media and those kinds of things.	19	A And then he would pay me back. He would
10:49:19	20 Q And you're referring to the lease for the	10:51:09	20 arrange for me to get paid back --
	21 office that you shared with Mr. Bergstein?	21	Q You said --
	22 A Yes, sir.	22	A -- every so often.
	23 Q Now, there's a reference here to Amex; is that	23	Q -- you said you would loan the company. What
	24 correct?	24	company are you referring to?
10:49:30	25 A Yes, there is.	10:51:13	25 A Either one, whichever needed the money.
Page 51		Page 53	
10:49:30	1 Q Okay. And you testified yesterday that you	10:51:16	1 Q Either one is Integrated Administration or
	2 have or had a -- a black Amex card?	2	K.Jam Media?
	3 A I did.	3	A Yeah.
	4 Q And I believe you said this was the highest	4	Q Okay. And the next line of the e-mail you
10:49:39	5 level status that a member of American Express can have?	10:51:26	5 wrote, "That should leave us a thousand bucks that I
	6 A That was the case back then, I think.	6	want to use to get your patio furniture."
	7 Q Okay. And you also testified that you used	7	Do you see that?
	8 that Amex card for personal expenses; right?	8	A Yes.
	9 A I used it for personal and business, yes.	9	Q So you wanted use a few thousand of the
10:49:54	10 Q Okay. So in this e-mail you're requesting	10:51:39	10 \$175,000 to purchase Mr. Bergstein's patio furniture?
	11 \$175,000; is that correct?	11	A Mr. Bergstein had a patio in his office. He
	12 A I'm telling him that there's \$175,000 in bills	12	had requested to have a couple of chairs and a table
	13 to get caught up. That's what I'm saying.	13	there. That's what I'm referring to. This was for the
	14 Q Okay. And are you -- you're also advising	14	office. His office had a patio.
10:50:11	15 Mr. Bergstein that, at least a certain amount of that	10:51:55	15 Q His office had a patio as part of --
	16 money, needs to go towards your black Amex card; is that	16	A His private had a -- had a door that would go
	17 correct?	17	into a little patio. He wanted to have a table and a
	18 A I'm telling him that was probably part of the	18	chair in his patio. This is what I'm referring to.
	19 175 to get caught up was an American Express card bill	19	Q So you were going to buy furniture for this
10:50:24	20 that he had charges on.	10:52:06	20 patio that was connected to his office?
	21 Q And you had charged as well?	21	A Yes. It was office furniture.
	22 A Probably, yes.	22	Q Okay.
	23 Q And there's a reference there to the	23	A He had requested it, and I told him this is how
	24 landscaping and the antiques.	24	we can get it.
10:50:32	25 Do you see that?	10:52:16	25 Q Okay. So did you, in fact, buy that patio

Page 54		Page 56	
10:52:21	1 furniture?	11:06:20	1 don't --
	2 A We eventually bought the patio furniture. I	2	Q Are this any documents among the ones that
	3 don't remember if I bought it, or his office bought it,	3	you've produced in this litigation that could refresh
	4 or how it got purchased. But he ended up with a few	4	your recollection?
10:52:30	5 chairs and a table out on his patio, yes.	11:06:26	5 A I don't know.
	6 Q Okay. What became of that furniture?	6	Q Okay. None that you're aware of as you sit
	7 A I have no idea what he did with it.	7	here today?
	8 Q Okay. He took it with him at some point?	8	A None that I'm aware of.
	9 A I have no idea.	9	Q Okay. And let's look at the next payment.
10:52:41	10 MR. LATZER: Okay. Let's take short break.	11:06:39	10 A Same page?
	11 THE VIDEOGRAPHER: We're going off the record	11	Q Same page. March 13, 2012 there's a transfer
	12 at 10:50 a.m.	12	of monies from Swartz IP to Integrated Administration
	13 (A recess was taken.)	13	for \$50,000.
	14 THE VIDEOGRAPHER: We're back on the record at	14	Do you see that?
11:04:52	15 11:02 a.m.	11:06:49	15 A Yes, I do.
	16 BY MR. LATZER:	16	Q And do you know what this payment was for?
	17 Q Okay. Mr. Jam, I want to take you back to what	17	A I do not.
	18 was marked as Exhibit 40 of Mr. Zarrinkelk's deposition,	18	Q Okay.
	19 the bank records.	19	A And we can assume that's the case for of these
11:05:05	20 A Yes. Yes, sir.	11:06:56	20 transactions.
	21 Q Okay. If you could turn to page 36, please.	21	Q Do you have an understanding as to the reason
	22 A Yes, sir.	22	that the payment was made?
	23 Q Okay. Let's look at the March 9th transaction	23	A I don't.
	24 on that page, and it reflects a \$100,000 payment from	24	Q Okay. Do you know whether Integrated
11:05:28	25 Swartz IP to Integrated Administration.	11:07:03	25 Administration provided any goods or services to Swartz
Page 55		Page 57	
11:05:29	1 Do you see that?	11:07:05	1 IP?
	2 A Yes, I do.	2	A My answer is not going to change.
	3 Q Okay. And do you have an understanding as to	3	Q Okay. And as you sit here, are there -- I'm
	4 what this payment was for?	4	correct that there are no documents that you can
11:05:37	5 A No, I don't.	11:07:14	5 identify that would refresh your recollection as to
	6 Q Okay.	6	those issues?
	7 A I don't recall.	7	A I don't know.
	8 Q Do you know if Integrated Administration	8	Q Specifically any documents that you produced in
	9 provided any goods or services to Swartz IP?	9	discovery in this case --
11:05:47	10 A My -- my answer's not going to change. I feel	11:07:26	10 A I don't --
	11 like we've gone through that.	11	Q -- that would refresh your recollection?
	12 Q Okay. And there are no records that would	12	A -- I don't know.
	13 refresh your recollection as to the purpose of the	13	Q Let's look next page, page 37.
	14 payment?	14	A Okay.
11:05:57	15 A There could be records out there. I don't know	11:07:38	15 Q March 22nd, 2012 transfer of \$125,000 to
	16 what's out there.	16	Integrated Administration from Swartz IP.
	17 Q What records are you referring to?	17	Do you see that?
	18 A As I said, I don't know what David was doing	18	A I do.
	19 with other people, what he had in between them, what	19	Q Okay. Do you -- and you have no idea the
11:06:07	20 agreements he had on behalf of Swartz IP. He was the	11:07:51	20 purpose of this payment?
	21 president. He founded the company. And so I don't know	21	A No, I don't have any recollection of that.
	22 what he had and what documents he might have in his	22	Q Okay. Is it your testimony at one point you
	23 possession.	23	understood the purpose of this payment?
	24 Q Do you have any documents in your possession?	24	A My -- my testimony has not changed. I feel
11:06:18	25 A I don't. Whatever I have you guys have, so, I	11:08:02	25 like you've asked this question many times, and my

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<p>11:08:05 1 answer's always going be the same. I don't know where 2 these monies were coming from and what they were coming 3 from. David was funding IA. David would arrange 4 funding into IA, and would tell me what to do with the 11:08:16 5 money when it came in. How much of it to spend on what 6 bills, payroll, et cetera. That's the case for all the 7 deposits, all the monies that he brought into Integrated 8 Administration. 9 Q Okay. And you were the CFO of Integrated 11:08:25 10 Administration; right? 11 A I was the officer of Integrated Administration, 12 yes. 13 Q But not just the officer, the chief financial 14 officer? 11:08:32 15 A I was the officer of the company, yes. 16 Q Were you the chief financial officer? 17 A I was listed as that in the documents, yes. 18 Q Okay. So you were responsible for the -- 19 having an understanding of the monies that were coming 11:08:42 20 in and out of this company? 21 A I would ask him if it was income or not. I 22 would tell Majid whether it was income or not, and then 23 Majid can do the proper accounting to make sure 24 everything was done by the book. 11:08:53 25 Q You would only ask him whether it was income?</p>	<p>11:09:47 1 Q That you would use placeholders to describe the 2 fund that were coming in from Swartz IP; is that 3 correct? 4 A Sometime -- no, what -- that is not correct. 11:09:58 5 What David would tell me sometimes, he would say, it's 6 this or that. I would write that to Majid and say this 7 is what he said it was. That was the placeholder. It 8 it wasn't necessarily money coming in from Swartz IP. 9 It was any funding that he had arranged. And then later 11:10:09 10 we would try to get -- he would ask for the ledgers and 11 fill out exactly what was what, and how things tied to 12 one another. 13 Q Okay. Let's look at the next transaction on 14 page 37. It's a -- dated March 26, 2012, and it's a 11:10:33 15 \$40,000 transfer from Swartz IP to Integrated 16 Administration. 17 Do you see that? 18 A I do. 19 Q So you have no idea what this payment was for? 11:10:45 20 A My answers are the same for all of these. 21 Q Can you just answer the question? 22 A No, I do not. 23 Q Okay. And as you sit here today, you don't 24 know -- or sorry, you're not aware of any goods or 11:10:56 25 services that Integrated Administration provided to</p>
Page 59	Page 61
<p>11:08:54 1 A I would ask whether it was income, or what it 2 was how to characterize the money that was coming in. 3 Q Okay. Did you ask for any documents to 4 determine whether that was -- his characterization was 11:09:01 5 accurate or not? 6 A No. I don't remember doing that. 7 Q Okay. And what -- as the -- as the CFO of 8 Integrated Administration, what did you understand your 9 responsibilities to be? 11:09:09 10 A I just passed all my accounting to the 11 accounting firm and had them do all the accountings, and 12 make sure all the taxes were done, and all the books 13 were clean, and everything was ledgers and whatnot. So 14 I would pass everything over to my accountant. 11:09:24 15 Q And am I correct that that was done at some 16 point after all of the monies were received from Swartz 17 IP? 18 A Was done? What was done? Any time there was a 19 a transaction, then I would notify him. 11:09:37 20 Q I understood your testimony before was that 21 you -- what you described as a placeholder for the 22 attorney -- 23 A Sometimes he would give a placeholder, yes. 24 Q Let me just finish. 11:09:46 25 A Sorry.</p>	<p>11:10:58 1 Swartz IP for this transfer? 2 A Like I said, I don't know if any of the work 3 that the employees were doing was for Swartz IP. I 4 don't know what David Bergstein was doing for Swartz IP, 11:11:05 5 what deals he had doing, what he was consulting on, what 6 he was helping them with. I do not know what he was 7 doing. 8 Q Okay. And there are no documents or records 9 that you can -- would refresh your recollection as to 10 that? 11:11:19 10 A I haven't seen any. You can -- maybe David 11 Bergstein has documents. 12 Q Okay. Let's look at page 50. 13 A Just a second, please. Okay. 14 Q And I want to direct your attention to the 11:11:47 15 May 31st, 2012 transfer from Swartz IP Services Group to 16 Integrated Administration for \$200,000. 17 Do you see that? 18 A Yes, I do. 19 Q Okay. And this is another transfer of funds 11:11:57 20 for which, as you sit here today, you have no idea what 21 the purposes of it was for? 22 A It could have been to pay us back for employees 23 that were working on things that were related to Swartz 24 IP. 11:12:11 25</p>

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11:12:13 1 Q Okay. What -- what employees are you referring
2 to?
3 A The employees of Integrated Administration at
4 the time.
11:12:24 5 Q Okay. And what services were they providing to
6 Swartz IP?
7 A I don't know what they working on at the time.
8 Maybe one -- some of the things they were doing were
9 related to Swartz IP, as I said earlier today.
11:12:33 10 Q You -- you don't know one way or the other?
11 A I don't know what they were working on at the
12 time.
13 Q You're just -- you're just speculating that
14 perhaps employees of Integrated may have been working
11:12:39 15 for Swartz IP?
16 A I don't know specifically what the employees
17 were doing on or around this time.
18 Q Okay. Are you able to identify a single -- the
19 name of a single Integrated Administration employee who
11:12:48 20 was doing work for Swartz IP at this time?
21 A I don't know what they were doing at the time.
22 Q Okay. But can you answer my question?
23 Are you able to identify a single Integrated
24 Administration employee who was doing work for Swartz IP
11:12:58 25 at this time?

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11:13:00 1 A David Bergstein.
2 Q Okay. What was he doing for Swartz IP?
3 A I don't know. I've already told you I don't
4 know what he was doing, but clearly he was doing a lot,
11:13:02 5 because he was effectuating all this work.
6 Q Okay. And are -- I'm correct that there are no
7 records that would refresh your recollection in this
8 regard specifically with respect to this \$200,000
9 payment?
11:13:20 10 A I don't know what's out there.
11 Q Can you turn page 53, please.
12 A Yes, sir.
13 Q Do you see that?
14 And I want to direct you to the last
11:13:43 15 transaction on this page, June 28, 2012. It's \$100,000
16 transfer into Integrated Administration from Swartz IP;
17 is that correct?
18 A Yes, that is correct.
19 Q Okay. So this is another transfer of monies
11:13:54 20 for which you don't know the purpose of?
21 A This was funding coming in that David had
22 arranged, yes.
23 Q Okay. You're not aware of any goods or
24 services that Integrated Administration provided Swartz
11:14:09 25 IP in exchange for this payment?

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11:14:12 1 A My answer is the same. I've answered that
2 question probably ten times now.
3 Q Okay. But just with respect to this particular
4 transfer, you're not aware of any --
11:14:21 5 A My answer is the same.
6 Q Just let me finish. You're not aware of any
7 goods or services that Swartz IP provided Integrated
8 Administration in exchange for this payment?
9 A My answer is the same.
11:14:31 10 Q And that's that you don't know?
11 A My answer is the same as I -- you can rewind
12 the tape. It's the same answer. I don't know what the
13 employees were doing at the time, I don't know what
14 David was doing at the time, what deals he was working
11:14:40 15 on. He owned that company, he was the front, he called
16 the shots. I don't know what he was working on with
17 Jerry or anybody else. As far as I know, he was working
18 on only deals for Swartz IP, and this is how the money
19 was being generated. I do not know the answer to that
11:14:54 20 question.
21 Q Okay. And there are no documents or records
22 that would refresh your recollection in that regard?
23 A Not I know of.
24 Q Page 57, please.
11:15:10 25 A Yes, sir.

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11:15:11 1 Q And I want to direct you to three transactions
2 on this page, July 2nd, July 11th, and July 13th.
3 Let's look at the first one July 2nd, 2012, a
4 \$200,000 transfer from Advisory IP Services to
11:15:31 5 Integrated Administration.
6 Do you see that?
7 A I do. I see all three of them.
8 Q Okay. Now, with respect to this first one,
9 again, you're not aware any goods or services that
11:15:42 10 Swartz IP provided to Integrated Administration in
11 exchange for this payment?
12 A My answer's going to be the same.
13 Q And you don't know the purpose of this payment?
14 A My answer's going to be the same.
11:15:53 15 Q Which is that you don't know the purpose of the
16 payment?
17 A You've asked me the same question now ten
18 times. My answer is the same.
19 Q I'm -- I have asked you the same question --
11:16:02 20 A Yeah.
21 Q -- but I'm referring to specific transfers.
22 A Right. And I could tell you this -- these
23 three transaction --
24 Q Uh-huh.
11:16:04 25 A -- my answer's the same as I have for the last

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<p>11:16:08 1 ten transactions that you've shown me. 2 Q Okay. And to be clear, you don't know the 3 purpose for the transfers? 4 A I don't know what David was doing, but David 11:16:14 5 was arranging this funding in. I don't know what he was 6 working on, but David Bergstein arranged the funds to 7 come in. He was in control of the Swartz IP company and 8 accounts. 9 Q Okay. And you're not aware of any documents or 11:16:24 10 records that would refresh your recollection as to the 11 purpose -- 12 A I don't know what had David internally. As I 13 said, I don't know what documents David had, so I don't 14 know. 11:16:38 15 Q Okay. Let's look at what I've marked as 16 Exhibit 6. 17 A Put this away? 18 Q Yes. 19 (Exhibit 6 was marked for 11:16:59 20 identification by the Court Reporter 21 and is attached hereto.) 22 BY MR. LATZER: 23 Q And this is an e-mail from you to 24 Mr. Zarrinkel's employee -- 11:17:13 25 A Yes.</p>	<p>11:18:05 1 increase in salary was warranted? 2 A He was the one who was bringing in the funding. 3 I didn't care if he increased his salary. 4 Q Okay. Well, let me ask you this: Why was 11:18:15 5 Mr. Bergstein receiving a salary in the first place from 6 Integrated Administration? 7 A Because he was doing a lot of work, and he was 8 funding IA, and he wanted to be on the payroll. 9 Q And what do you mean by "he was doing a lot of 11:18:26 10 work"? What work are you referring to? 11 A He worked on all the transactions. He was 12 working with the Weston guys, he was working with 13 Sovrin, he was working on a number -- on all kinds of 14 transactions all day, all day every day. 11:18:40 15 Q Do you know what his salary was before you 16 requested an increase to \$300,000 per year? 17 A I don't recall what it was. 18 Q And you were receiving a salary from Integrated 19 Administration as well; right? 11:18:53 20 A On and off, yes. 21 Q Okay. And -- 22 A When there wasn't money I wouldn't take a 23 salary. There was plenty of times where everybody else 24 got checks and I didn't. 11:19:01 25 Q Okay. And what work were you doing for</p>
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<p>11:17:13 1 Q -- dated November 29, 2011? 2 A Yes. 3 Q Do you see that? And the e-mail reads, "Hey, 4 Ray, increase his salary to 300K per year as of the next 11:17:25 5 payroll starting Monday." 6 Did I read that correctly? 7 A Yes, you did. 8 Q And the subject of the e-mail is David 9 Bergstein? 11:17:30 10 A That's correct. 11 Q So this is you requesting that Integrated 12 Administration increase Mr. Bergstein's salary? 13 A Yes. That is what this is. 14 Q Okay. And do you -- do you recall making this 11:17:43 15 request? 16 A Not specifically, but this is my e-mail. 17 Q Okay. So do you recall what prompted you to 18 ask for an increase -- 19 A I'm sure David asked me to do it. 11:17:52 20 Q Just let me finish. 21 A Sorry. 22 Q Do you recall what prompted you to ask for an 23 increase in Mr. Bergstein's salary for your company? 24 A David asked to have his salary increased. 11:18:02 25 Q Okay. Is there -- do you recall whether an</p>	<p>11:19:04 1 Integrated Administration that warranted a salary? 2 A I was in the office, I was -- I was the guy in 3 the office. That's why I was an officer of a bunch of 4 these companies. I was the guy that had a guy to scan 11:19:14 5 it. I had access to the copier. Nobody else was 6 around. David was always out. His voice mail was full 7 by 7:00 a.m. The Weston guys lived in other states. 8 That's why I ended up becoming -- they'd sign on a bunch 9 of these companies. That's what I did. I was in the 11:19:28 10 office doing my work, trying to generate money to feed 11 IA, and I did that myself. 12 Q Okay. Is it fair to say that the work you were 13 doing was arranging for the transfers of monies that 14 Mr. Bergstein requested of you? 11:19:42 15 A Say that one more time? 16 Q Is it fair to say that the work that you were 17 doing for IA was arranging for the transfers of monies 18 that Mr. Bergstein requested of you? 19 A That was part of what I did, yes. 11:19:50 20 Q Okay. What else did you do? 21 A I made movies, I was developing stuff. I 22 consulted for Broadway 4D. I did whatever I could do to 23 try to generate money. 24 Q And you consider that work that you were 11:20:01 25 performing for Integrated Administration?</p>

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11:20:03	1	A Yes.	11:22:27	1	A Yes.
	2	Q Making movies for Integrated Administration?		2	Q And you write, "Hey Dude. Just to refresh. As
	3	A I made movies. I used my salary to fund		3	you are looking up to divvy up the Pineboard cash,
	4	Integrated Administration. I wanted it to be a success.		4	payroll is 56, bills, including rent and Josh Furman
11:20:11	5	I took out loans myself to make sure people had health	11:22:41	5	Law, health insurance, parking, et cetera, is 53."
	6	insurance, health benefits, and the parking was paid so		6	Did I read that correctly?
	7	they had a place to park their car.		7	A Yes, you did.
	8	Q And you're referring to people who were		8	Q Okay. And is this referring to -- well, strike
	9	employed by Integrated Administration?		9	that.
11:20:24	10	A The office, yes.	11:22:54	10	There's a reference her to divvying up
	11	Q Okay. Are you referring -- did Integrated		11	Pineboard cash.
	12	Administration have individuals who were employed, who		12	A There was money in Pineboard, and I think
	13	actually performed work for Integrated Administration?		13	this -- obviously, as I've said repeatedly, when there
	14	A I don't know what you mean.		14	are funds, David would tell me where and how the money
11:20:37	15	Q Well, were they -- did it have employees who	11:23:05	15	to be spent. This is me pointing out to David that
	16	were, as you understood, performing work for other		16	there's \$56,000 needed for payroll, and \$53,000 needed
	17	entities?		17	for bills. I just wanted him to keep that in mind as he
	18	A Yes.		18	was deciding what was going to get paid.
	19	Q Okay. Did it have any employees who you		19	Q And is this -- this payroll, is that referring
11:20:45	20	understood were performing work strictly for Integrated	11:23:18	20	to IA's payroll?
	21	Administration?		21	A Yes.
	22	A Probably. I mean, Steve Piscula was always		22	Q Okay. And the bills, were those referring to
	23	around in the office making sure the office ran		23	IA's bills?
	24	properly, helping Frymi with whatever she was doing at		24	A This is all the bills. I don't know
11:20:59	25	the time. You know, my assistant worked for me doing	11:23:24	25	specifically what. I can just tell you that it included
Page 71			Page 73		
11:21:01	1	whatever I needed him to do. The receptionist was there	11:23:27	1	this stuff and other stuff. I don't know specifically
	2	answering the phones all day. That kind of stuff.		2	what bills were included, but, yeah.
	3	Q Okay. Did you receive any compensation for the		3	Q Okay. Well, there's a reference there to rent.
	4	officer positions that you held with K.Jam Media?		4	Is that referring to the rent that needed to be paid for
11:21:23	5	A If there -- did I receive compensation from	11:23:35	5	the office that you shared with Mr. Bergstein?
	6	K.Jam Media? I think my compensation primarily came		6	A Could be, yes.
	7	from K.Jam. Some of it probably came K.Jam Media, some		7	Q You're not sure?
	8	form IA.		8	A It could be the rent of the warehouse. We had
	9	Q Okay. How can K.Jam Productions?		9	a rent -- there was a warehouse that had stuff in
11:21:40	10	A Some K.Jam Productions. Because I think one or	11:23:41	10	storage in it. I don't know if it was the warehouse,
	11	two of the agreements I had were with K.Jam Productions,		11	but -- or the office. Maybe the office. Probably the
	12	so when money would come into K.Jam Production --		12	office. But I don't know what this e-mail from eight
	13	sometimes funds would come into that entity, yes.		13	years ago is referring to.
	14	Q Okay. You took a salary from K.Jam Media?		14	Q What warehouse were you referring to?
11:21:51	15	A I don't remember ever taking -- like, a regular	11:23:54	15	A There was a warehouse that was -- I don't when
	16	salary? No, I don't think so.		16	it was, around this time, maybe after this, there was a
	17	Q Okay. How about from K.Jam Productions?		17	warehouse that there were rent payments due on as well.
	18	A No. Not a regular salary.		18	Q Okay. And where was that warehouse located?
	19	Q Let's take a look at Exhibit 7.		19	A Somewhere in the Valley.
11:22:16	20	(Exhibit 7 was marked for	11:24:06	20	Q Okay. And what was the purpose of that
	21	identification by the Court Reporter		21	warehouse?
	22	and is attached hereto.)		22	A Storing stuff.
	23	BY MR. LATZER:		23	Q For?
	24	Q And this is an e-mail from you to Mr. Bergstein		24	A David's stuff. Some stuff for Ron Tutor.
11:22:23	25	dated February 22nd, 2012; is that correct?	11:24:15	25	Documents. Uh -- um, library stuff. All kinds of

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11:24:22	1 stuff.	11:26:22	1 identification by the Court Reporter
	2 Q Okay. And so in whose name was the warehouse		2 and is attached hereto.)
	3 space, I'll say, leased?		3 BY MR. LATZER:
	4 A K.Jam Media.		4 Q And this is a March 6, 2012 e-mail from
11:24:31	5 Q Okay. And how big was the space?	11:26:31	5 Mr. Bergstein to you; is that correct?
	6 A I don't remember how many square feet, but it		6 A Yes, it is.
	7 was a good size.		7 Q And Mr. Bergstein wrote, "Kia, I wired 300K to
	8 Q Okay. And who had access to the warehouse?		8 Integrated Administration."
	9 A David, myself, Frymi, and a couple of the guys		9 Do you see that?
11:24:45	10 that worked for David were there all the time.	11:26:44	10 A Yes, I do.
	11 Q What prompted you to obtain warehouse space?		11 Q Now did you understand the source of these
	12 A David and Ron needed the space. I just put it		12 monies that had been wired Integrated Administration?
	13 in -- he asked me to put it in K.Jam Media's name, and I		13 A No.
	14 did.		14 Q Okay. And did you -- well, strike that.
11:24:59	15 Q Okay. And do you still have that warehouse	11:27:08	15 As you sit here today, do you understand the
	16 space today?		16 source for these monies?
	17 A No. No, years and years ago it went away.		17 A No.
	18 Q Okay. How did it go away?		18 Q Okay. Let's look back at the bank records
	19 A They scanned all the documents, and got rid of		19 marked as Exhibit 40 of Mr. Zarrinkelk's deposition.
11:25:13	20 everything and got rid of the space. That's my	11:27:22	20 A Okay.
	21 understanding of what they did.		21 Q And let me direct you to page 36.
	22 Q So the warehouse space was mostly used for		22 A Okay.
	23 documents?		23 Q And the first transaction the top dated
	24 A There was a lot of documents in there, yes.		24 March 6, 2012, reflects, as we looked at before, a
11:25:18	25 Q And do you know what those documents were?	11:27:43	25 payment from Swartz IP Services Group to Integrated
Page 75		Page 77	
11:25:22	1 A Having to do the film libraries and other	11:27:45	1 Administration for \$300,000.
	2 stuff. I don't know. I don't know all the documents,		2 Do you see that?
	3 but I know a lot of the film stuff was in there.		3 A I do.
	4 Q Okay. So approximately when did K.Jam Media		4 Q Okay. So do you agree with me that this e-mail
11:25:35	5 stop leasing the warehouse space?	11:27:51	5 is referring to monies that came in from Swartz IP to
	6 A I don't remember.		6 Integrated Administration?
	7 Q Okay. And do you know how much was paid toward		7 A It seems like it.
	8 renting the warehouse space?		8 Q Okay. And by monies, I'm referring to
	9 A I don't remember how much the rent was.		9 \$300,000.
11:25:45	10 Q Okay. And there's a reference here to Joshua	11:28:02	10 A Yes, sir.
	11 Furman Law.		11 Q Okay. So Mr. Bergstein writes, "Upon receipt,
	12 Do you see that?		12 please wire out \$63,167.36 to," and then there's
	13 A Yes.		13 reference to Farmers and Merchants Bank.
	14 Q Who's that?		14 Did I --
11:25:51	15 A He's an attorney.	11:28:16	15 A Yes.
	16 Q And who did you perform work for?		16 Q -- read that correctly?
	17 A He performed work for David on a number of		17 A Yes.
	18 things, and also he did some work for CAC.		18 Q Okay. And the account name identified in
	19 Q Okay. CAC is your company?		19 Mr. Bergstein's e-mail is Carol Watson's Orange Coast
11:25:59	20 A It's one of my entities, yes.	11:28:19	20 Auctions."
	21 Q Okay. Did he perform work for you in any other		21 Do you see that?
	22 respects?		22 A Yes.
	23 A I don't think so.		23 Q Okay. So do you have an understanding as to
	24 Q Let's look at Exhibit 8.		24 what Carol Watson's Orange Coast Auctions is?
11:26:22	25 (Exhibit 8 was marked for	11:28:32	25 A No.

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11:28:32	1 Q Okay. Do you understand why Mr. Bergstein was	11:30:44	1 to Integrated Administration?
	2 asking you to use money that came from Swartz IP to pay		2 A No.
	3 Carol Watson's Orange Coast Auctions?		3 Q Okay. Let's look again at page 36 of
	4 A No.		4 Exhibit 40.
11:28:42	5 Q Did you ever have a discussion with	11:30:59	5 A Okay.
	6 Mr. Bergstein regarding this payment?		6 Q And you see on that page the March 13, 2012
	7 A I don't recall.		7 transfer funds --
	8 Q Did you understand that Mr. Bergstein was		8 A I do.
	9 asking you to use Swartz IP's money to purchase		9 Q -- from Swartz IP to Integrated Administration
11:28:55	10 something from Carol Watson's Orange Coast Auctions for	11:31:09	10 for \$50,000?
	11 his personal use?		11 A I do.
	12 A No.		12 Q So do you agree with me that this reference in
	13 Q Okay. So as you sit here today, you have no		13 Mr. Bergstein's e-mail is a reference to the monies that
	14 idea why this payment was directed to Carol Watson's		14 were -- that came in from Swartz IP Services Group?
11:29:12	15 Orange Coast Auctions?	11:31:20	15 A It seems like it.
	16 A I don't.		16 Q Okay. Now the second sentence of that e-mail
	17 Q Okay. Now let's look the last line of this		17 states, "I need 20K sent to the trust."
	18 e-mail. Mr. Bergstein wrote, "As to the rest, pay Amex		18 Do you see that?
	19 and hold the rest for payroll first."		19 A Yes.
11:29:24	20 Do you see that?	11:31:28	20 Q And that's a reference to Mr. Bergstein's
	21 A Yes.		21 personal trust?
	22 Q Okay. And by "pay Amex," that's a reference to		22 A Yes.
	23 paying off your American Express black card; is that		23 Q And as -- you understood that was a trust that
	24 correct?		24 was in place to benefit his family?
11:29:31	25 A That's the American Express card he's referring	11:31:37	25 A Yes.
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11:29:32	1 to.	11:31:38	1 Q Okay. You responded to Mr. Bergstein that same
	2 Q Okay. And that's the American Express card		2 day and you wrote, "Okay. I will arrange. Can I use
	3 that, at least in part, was used to pay for your		3 the 30 for bills?"
	4 personal expenses?		4 Did I read that correctly?
11:29:39	5 A There was some personal expenses on it, yes.	11:31:51	5 A Correct.
	6 I, at times, would write personal checks for my personal		6 Q Okay. And Mr. Bergstein responded, "There's an
	7 expenses on top of that.		7 e-mail after this. 25 has to go out, 10 to trust, 15 to
	8 Q Okay.		8 Graybox. The rest is yours."
	9 A Or I would reduce my loan amounts by the		9 Did I see that -- did I read that correctly?
11:29:49	10 personal expenses that were paid. It was all tracked.	11:32:04	10 A Yes.
	11 Q Let's look at Exhibit 9.		11 Q And so when Mr. Bergstein wrote to you "the
	12 (Exhibit 9 was marked for		12 rest is yours," that meant that you could use that money
	13 identification by the Court Reporter		13 to pay off your American Express bill; is that correct?
	14 and is attached hereto.)		14 A I used it for bills. Down here it says
11:30:07	15 BY MR. LATZER:	11:32:18	15 "bills." I don't know what the bills were at the time,
	16 Q And Exhibit 9 is a series of e-mails exchanged		16 but it was bills. Likely rent, you know, health
	17 between you and Mr. Bergstein on March 13, 2012.		17 insurance or other insurance, phone, Internet -- bills.
	18 Do you agree with me?		18 Q So when Mr. Bergstein wrote "The rest is
	19 A Yes.		19 yours" --
11:30:29	20 Q Okay. Let's start at the bottom, the first	11:32:37	20 A That means I can decide what -- you know, which
	21 e-mail. Mr. Bergstein wrote to you, "I wired 50K to		21 of the bills get paid, 'cause it probably wasn't enough
	22 Integrated Administration."		22 to pay all the bills, so I would call the phone company
	23 Do you see that?		23 an say instead of 1,200 bucks, I'll pay you 800. Give
	24 A Yes, I do.		24 me another two weeks. I would pay off the parking, or
11:30:41	25 Q Now, do you know the source of that 50K payment	11:32:49	25 buy parking stickers so people could park in the

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<p>11:32:52 1 building or, you know, whatever. I would, you know, use 2 that -- whatever I could to pay the bills that were on 3 fire the most. 4 Q It's fair to say when he wrote, "The rest is 11:32:59 5 yours" he was indicating to you that you could use the 6 money as you saw fit? 7 A I could use the money for the bills is what he 8 was indicating. 9 Q Where here does he refer to bills? 11:33:09 10 A My question is, "Can I use the 30 for bills", 11 and he says, "The rest is yours," meaning for the bills. 12 I used that money for the bills. 13 Q Okay. In the e-mail at the top, you responded 14 to Mr. Bergstein and you wrote, in part, "Mine. Yay." 11:33:21 15 Is that correct? 16 A Yes. 17 Q Okay. In the next line you wrote, "I wonder if 18 there's a direct flight to Vegas from here," question 19 mark. 11:33:32 20 Do you see that? 21 A I do. 22 Q Did you go with Mr. Bergstein to Las Vegas 23 often? 24 A I went to Vegas with David on probably two 11:33:39 25 occasions, but this was just me joking here. I did not</p>	<p>11:35:03 1 Q Okay. 2 A That's that Steve started it as, yes. 3 Q Okay. Now Mr. Piscula's e-mail, the bottom one 4 on page 1, he states, "This check was written today from 11:35:20 5 IA." 6 Did I read that correctly? 7 A Yes. 8 Q Okay. And there's a reference on the next page 9 of this document to Definity Media, Evan Warshawsky. 11:35:33 10 A Correct. 11 Q Is that correct? 12 A Yes. 13 Q And so is it your understanding that at this 14 time Integrated Administration was making a \$12,000 11:35:41 15 payment to Definity -- Definity Media? 16 A For Evan Warshawsky's services. 17 Q Okay. Do you know what services he provided? 18 A He was providing accounting, CPA services for a 19 multitude of the entities over the years. I don't know 11:35:53 20 specifically what he was doing at this time. 21 Q Okay. Now, you responded to Mr. Piscula's 22 e-mail also on April 13, 2012, and you wrote, "Was there 23 an incoming wire? We don't fund for these checks. Zero 24 float." 11:36:10 25 Do you see that?</p>
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<p>11:33:43 1 go to Vegas here. I spoke to Majid, the wires are going 2 out. This was just me being -- trying to be funny in 3 the top. But on other occasions I went to Vegas with 4 David in a group, probably twice. Maybe three times 11:33:57 5 over the last -- 6 Q And was the purpose of trips to Las Vegas? 7 A Socialization, fun, birthdays, that kind of 8 things. 9 Q Gambling? 11:34:05 10 A I play a little bit of Black Jack, not big. A 11 couple hundred bucks. I'm still not good at poker. 12 Q Okay. Let's look at Exhibit 10. 13 (Exhibit 10 was marked for 14 identification by the Court Reporter 11:34:25 15 and is attached hereto.) 16 BY MR. LATZER: 17 Q And Exhibit 10 consists of various e-mails 18 exchanged on April 13, 2012 and April 14, 2012. 19 Is that correct? 11:34:46 20 A Okay. 21 Q Do you agree with me? 22 A Yes. 23 Q Okay. Now, the subject of these e-mails is 24 Integrated Administration transaction; is that correct? 11:35:01 25 A That's what it says.</p>	<p>11:36:11 1 A Yes. 2 Q Okay. Let me just ask you. Mr. Piscula, he 3 has an e-mail address at at kjammedia.com? 4 A He did at the time. 11:36:23 5 Q Okay. So he was an employee of your company, 6 K.Jam Media? 7 A No. That's just the e-mail he had. He was an 8 employee of Integrated Administration. 9 Q Okay. 11:36:28 10 A He just didn't have an Integrated 11 Administration e-mail thing. 12 Q Was Mr. Piscula ever employed K.Jam Media? 13 A No. K.Jam Media didn't have any employees. 14 Q Okay. Did he provide services to K.Jam Media? 11:36:41 15 A Sure. He helped me. 16 Q Mr. Piscula helped you? 17 A Yes. He was the office manager of the office 18 so, yes, he did help me. 19 Q Okay. But he was officially an employee of 11:36:53 20 Integrated Administration; is that correct? 21 A Yes. That's where he got his paycheck. 22 Q Okay. Now Mr. Bergstein responded to your 23 e-mail on April 14th. He wrote, "We deposited 40K on 24 Thursday." 11:37:04 25 Do you see that?</p>

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11:37:05	1	A I do.	11:39:20	1	Q Did you have an understanding of where 60K was coming from?
	2	Q Now, did you have an understanding as to the		2	
	3	source of those funds?		3	A No. I would assume that he said -- I spoke
	4	A No. I didn't even know the deposit had been		4	with him earlier that day and he mentioned something
11:37:13	5	made, clearly.	11:39:28	5	about the fact that he had wired in 60K.
	6	Q Okay. And you responded to Mr. Bergstein's		6	Q Okay. And is it your understanding that that
	7	e-mail that same day. You wrote, "Thanks Dude. Any		7	60K was going to be coming into Integrated
	8	love for Amex on Monday?"		8	Administration?
	9	Did I read that correctly?		9	A I don't know, based on this.
11:37:24	10	A Yes, you did.	11:39:39	10	Q Well, there's a reference here -- or two
	11	Q Okay. And by writing "Any love for Amex," that		11	references in this e-mail -- I'm sorry, three references
	12	was -- that was your question of whether funds from		12	to payroll.
	13	Integrated Administration could be paid to -- could be		13	A Uh-huh.
	14	used to pay off your American Express black card bill;		14	Q Was -- Integrated Administration was the
11:37:40	15	is that correct?	11:39:50	15	company that was being used to pay payroll --
	16	A No. That was me saying are you going to be		16	A Correct.
	17	able to make money available for American Express? I		17	Q -- is that correct?
	18	don't know if was going to be through IA, or an entity,		18	A Correct.
	19	or he was going to pay it directly. I don't know. This		19	Q Did any other company pay payroll?
11:37:49	20	is me reminding him that there's a payment due on the	11:39:55	20	A No, but the wire could have come into one of
	21	American Express, and is he going to do anything about		21	the other companies, to K.Jam Media, and I would have
	22	it. Trying to put it in front of his eye.		22	moved it to IA for payroll. So I don't know where the
	23	Q Okay. And to be clear, that was the American		23	60 came from, I don't know where it was sent, or if it
	24	Express black card bill that we've been referring to?		24	even arrived.
11:38:00	25	A That's the only one we'll refer to in all of	11:40:08	25	Q Okay. Now, the reference here for 250 for
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11:38:03	1	this for the rest of the day.	11:40:12	1	Amex, you're referring to \$250,000?
	2	Q Okay. And Mr. Bergstein wrote back to you on		2	A Yes.
	3	April 14, 2012, "Yes"?		3	Q Okay. And, again, that's monies that were
	4	A Yes.		4	going to be used to pay off the American Express black
11:38:09	5	Q Okay. And you responded, in part, on April 14,	11:40:24	5	card. That's -- that's correct?
	6	2012, "Sweet."		6	A It says there's \$250,000 due to American
	7	Is that correct?		7	Express, yes.
	8	A That's what it says.		8	Q Okay. So you're requesting monies to pay off
	9	Q Let's look at Exhibit 11.		9	the American Express black card?
11:38:35	10	A Thank you.	11:40:32	10	A I'm telling him what is needed to pay the
	11	(Exhibit 11 was marked for		11	bills, yes.
	12	identification by the Court Reporter		12	Q And just to be clear, it's the American Express
	13	and is attached hereto.)		13	black card?
	14	BY MR. LATZER:		14	A That is the only American Express card we're
11:38:43	15	Q And Exhibit 11 is an e-mail from you to Mr.	11:40:38	15	going to talk about today.
	16	Bergstein dated May 30th, 2012; is that correct?		16	Q Okay. Let's look at Exhibit 12.
	17	A Yes, it is.		17	(Exhibit 12 was marked for
	18	Q And you wrote, "Hey D.B., payroll is this week,		18	identification by the Court Reporter
	19	as you know. Assuming the 60K comes in today, as you		19	and is attached hereto.)
11:39:02	20	said, we will need 95 for payroll, 250 for Amex."	11:41:05	20	BY MR. LATZER:
	21	Did I read that correctly?		21	Q Exhibit 12 is a July 2nd, 2012 e-mail from
	22	A Yes, you did.		22	Mr. Bergstein to you; is that correct?
	23	Q Okay. Now the reference there to the 60 day --		23	A Yes, it is.
	24	excuse me, 60K coming in today; do you see that?		24	Q And the first sentence of the e-mail,
11:39:18	25	A I do.	11:41:27	25	Mr. Bergstein writes, "200K wire let to the IA account."

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11:41:33	1 Do you see that?	11:43:43	1 A It seems that way.
	2 A Yes.	2	Q You made a reference before to a company by the
	3 Q Do you understand that Mr. Bergstein meant that	3	name of Broadway 4D Theaters; is that correct?
	4 a 200K wire had been sent to the IA account?	4	A Yes.
11:41:41	5 A Sent or went probably, yes.	11:44:16	5 Q And I believe you referred to them yesterday
	6 Q Okay. Now, do you have an understanding as to	6	during testimony that you provided to Mr. Walker?
	7 the source of these funds?	7	A Yes, I did. Yes.
	8 A No.	8	Q Okay. And I believe you testified that it
	9 Q Okay. Let's look back at Exhibit 40.	9	would -- Broadway 4D is a project with which you'd been
11:41:52	10 A Okay. Page 36?	11:44:30	10 involved for many years; is that correct?
	11 Q No. Let's look the page 57, please.	11	A Correct.
	12 A Okay. Okay.	12	Q When did you first become involved in this
	13 Q And the first transaction on page 57 of	13	project?
	14 Exhibit 40 is dated July 2nd, 2012, and it reflects a	14	A Many, many years ago.
11:42:15	15 transfer from Advisory IP Services of \$200,000 to	11:44:38	15 Q Between five and ten?
	16 Integrated Administration; is that correct?	16	A Yeah.
	17 A I see that.	17	Q Okay. And what does that project entail?
	18 Q Okay. So do you agree with me that this	18	A It involves licensing some of the big numbers
	19 reference in Mr. Bergstein's July 2nd e-mail is	19	from the big Broadway musicals of history, and shooting
11:42:29	20 referring to monies that had come to Integrated	11:44:54	20 them on film in 3-D, and having big stars of today sing
	21 Administration from Swartz IP?	21	the respective songs from the big shows. It's kind of a
	22 A It seems that way.	22	theme park attraction, if you think about it. It's,
	23 Q Okay. So this is another instance in which	23	like, Madame Tussauds Museum. Instead of paying 26
	24 Integrated Administration is receiving monies from	24	bucks to see plastic people, you pay the entrance fee
11:42:41	25 Swartz IP?	11:45:12	25 and you sit, and for an hour you get to see some of the
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11:42:42	1 A It seems that way.	11:45:12	1 biggest numbers in the history of Broadway performed by
	2 Q Okay. And the second sentence of this e-mail	2	the biggest stars of today.
	3 Mr. Bergstein wrote, "When it comes in, pay Amex, and I	3	It's called Broadway 4D, because the theater
	4 will need a small wire sent out tomorrow."	4	will have some 4D elements like smell, and scent, and
11:42:53	5 Is that correct?	11:45:25	5 wind, and lights, and things of that sort.
	6 A That's what it says.	6	Q All right. So what's the status of this
	7 Q So this is another instance in which	7	project?
	8 Mr. Bergstein is directing funds from which you would	8	A Uh --
	9 use -- well, strike that.	9	MR. MIGLER: Counsel, I'm just -- I'm just
11:43:08	10 This is another instance in which Mr. Bergstein	11:45:31	10 going to object to any questions about Broadway just as
	11 is -- is sending you funds from which the American	11	being outside of the scope of the depo subpoena, because
	12 Express black card would be paid.	12	we're about IA. Unless this is going towards anything
	13 Is that correct?	13	to do with IA, I'm going to object as to relevance to --
	14 A It seems that way, yes.	14	to Broadway 4D.
11:43:20	15 Q Okay.	11:45:48	15 MR. WALKER: Well, For what it's worth,
	16 A He would always direct what the money was to be	16	yesterday David said that if we had other questions
	17 spent on. I have said that already.	17	addressed to him individually, then we could ask him.
	18 Q And specifically, this is another instance in	18	MR. MIGLER: I wasn't aware of that, but go
	19 which funds were coming from Swartz IP, and those funds	19	ahead. Thank you.
11:43:30	20 were going to be used to pay off the American Express	11:45:58	20 MR. WALKER: Thank you.
	21 black card; is that correct?	21	BY MR. LATZER:
	22 A According to this e-mail, he requested that	22	Q Can you tell me what the status of the project
	23 some of that wire be used to pay off the American	23	is?
	24 Express bill, correct.	24	A Uh, the project is still in the works. They
11:43:40	25 Q All right. And the wire was from Swartz IP?	11:46:03	25 have a new director on board now, a very high profile

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11:46:07	1	director is on board. The script is being rewritten and	11:48:03	1	you guys be okay with breaking now?
	2	there's hope that the project's going to go in front of		2	THE WITNESS: I'm good for -- I can go work
	3	cameras early next year.		3	through and be done with this early if you want, or we
	4	Q What's your role with respect to this project?		4	can break for lunch. Whatever you gentlemen prefer.
11:46:18	5	A I am hopefully going to be the one who produces	11:48:08	5	MR. LATZER: Yeah, let's take a break. Thank
	6	the actual movie part of it.		6	you.
	7	Q Okay. Have you invested any money in this		7	THE VIDEOGRAPHER: Going off the record at
	8	project?		8	11:46 a.m.
	9	A No.		9	(A lunch recess was taken.)
11:46:27	10	Q Have any companies with which you're affiliated	12:47:50	10	THE VIDEOGRAPHER: We are back on the record at
	11	invested money in this project?		11	12:46 p.m.
	12	A Yes. I have friends that have invested in it,		12	BY MR. LATZER:
	13	and I was a consultant for them, so they actually paid		13	Q Okay. And Mr. Jam, before we begin, I just
	14	me.		14	want to say that I understand that this process can be a
11:46:38	15	Q What -- what, uh, companies are you referring	12:48:12	15	little bit tedious, and it may seem like I'm asking
	16	to? These are your friends' companies?		16	repetitive questions. But I just want you to know that
	17	A I'm sorry, what?		17	I'm asking the questions because I need to, and I just
	18	Q You're referring to your friends' companies?		18	appreciate you bearing with me.
	19	A For what?		19	A I appreciate that, and if I appear frustrated,
11:46:48	20	Q Your -- am I understanding that your friends'	12:48:26	20	I apologize.
	21	companies invested in this project and you provided		21	Q I'm going to show you what I'm marking as
	22	consulting to those companies?		22	Exhibit 13.
	23	A No. I provided consulting services to Broadway		23	(Exhibit 13 was marked for
	24	4D.		24	identification by the Court Reporter
11:46:58	25	Q Okay. So they've paid you?	12:48:48	25	and is attached hereto.)
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11:46:59	1	A Yes.	12:48:48	1	BY MR. LATZER:
	2	Q Okay. But you haven't invested any monies?		2	Q Have you seen this document before?
	3	A I have not invested any money in it, no.		3	A I don't think so.
	4	Q Understood.		4	Q Okay. This document was introduced as an
11:47:03	5	Are you aware that in December 2013 that Swartz	12:49:08	5	exhibit at Mr. Bergstein's criminal trial, and it was
	6	IP transferred approximately \$40,000 to Broadway 4D		6	designated as Exhibit 46 during that trial.
	7	Theaters?		7	Do you see that on the bottom right there?
	8	A I wasn't, no. I'd forgotten if I did. I know		8	A I do.
	9	Jerry was really in -- Jerry -- I do know that there was		9	Q Okay. Now, on the first page of this exhibit,
11:47:16	10	a lot of discussion between David and Jerry about Jerry	12:49:25	10	you see the box that says "Swartz IP Services Group"?
	11	doing some very, very heavy lifting on -- on the show		11	A I do.
	12	and providing a giant loan or something, and I don't		12	Q And then there's an arrow pointing to
	13	think it ever happened. But there was a lot of		13	Integrated Administration.
	14	discussion that David Bergstein and Jerry had with the		14	Do you see that?
11:47:30	15	Broadway 4D folks.	12:49:35	15	A Yes.
	16	Q Okay.		16	Q And that reflects a payment of \$300,000 to
	17	A I was not in those discussions. I don't recall		17	Integrated Administration.
	18	them.		18	Do you see that?
	19	Q Do you know why Broadway would have been -- or		19	A That's what it says.
11:47:36	20	did receive monies from Swartz IP?	12:49:44	20	Q Okay. And we just saw this payment reflected
	21	A I don't what David and Jerry talked to Broadway		21	on a bank statement earlier today; is that correct?
	22	4D about. I think he was going to be a big investor in		22	A I don't remember if it's this one, but we did a
	23	it, Jerry was, I think. I don't know.		23	see \$300,000 payment. Yes, I will assume that's the
	24	Q I'm at a pretty good stopping point. I don't		24	case.
11:48:01	25	know whether -- it's a little early for lunch, but would	12:50:00	25	Q Okay. And let me ask you to turn to the last

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12:50:10	1 page of this exhibit.	12:52:02	1 A I would assume it was paying back a loan.
	2 A Okay. Whoa. Okay.	2	Q Okay. Is there a loan agreement to reflect
	3 Q Now, you'll see again the box that designated	3	that?
	4 Swartz IP --	4	A I would not do a loan agreement for myself. If
12:50:24	5 A Yes.	12:52:14	5 the company was short money, to the extent that I had
	6 Q -- and an arrow going over to Integrated	6	money, I would transfer money into the company to pay
	7 Administration?	7	the bills or whatever needed to get paid. And then when
	8 A Yes.	8	I could, I'd take the money back. There's still plenty
	9 Q And that reflects the \$300,000 payment that we	9	of outstanding loans and debt, unfortunately.
12:50:31	10 saw on the first page --	12:52:27	10 Q Okay. The entry below K.Jam House, it says,
	11 A Okay.	11	"Cash 45K."
	12 Q -- correct?	12	A Uh-huh.
	13 A Yes.	13	Q Do you see that?
	14 Q Now, I want you to focus first on the arrow	14	A Yes.
12:50:39	15 going down from Integrated Administration.	12:52:34	15 Q Do you have an understanding as to why \$45,000
	16 A Okay.	16	in cash would have been drawn from the Integrated
	17 Q And you'll see the name Don Carroll.	17	Administration bank account on November 29, 2011?
	18 A Yes.	18	A I don't remember. No.
	19 Q Do you see that?	19	Q Is that cash that was in your possession?
12:50:50	20 A Yes.	12:52:48	20 A I don't know, but I don't think so.
	21 Q Now, this reflects various payments from	21	Q But you were the authorized signatory on the
	22 Integrated Administration to individuals and entities	22	account?
	23 including the first one, Mr. Carroll.	23	A Yes, I was.
	24 A Okay.	24	Q Okay. Is there anyone else other than
12:51:06	25 Q Is that correct?	12:52:57	25 Mr. Zarrinkelk who would have been able to draw \$45,000
Page 99		Page 101	
12:51:07	1 A That's what it says.	12:53:01	1 from that account?
	2 Q Okay. Now the second entry below Mr. Carroll	2	A Somebody who had a check.
	3 is K.Jam House.	3	Q But this is reflecting a cash withdrawal
	4 Do you see that?	4	from -- from the account.
12:51:18	5 A Yes.	12:53:10	5 A Right. You write a check to cash; right?
	6 Q And next to that reflects a \$15,000 payment	6	Q Can -- can you -- so is there anyone who could
	7 from Integrated Administration to K.Jam House.	7	have withdrawal cash directly from that account other
	8 Do you see that?	8	than you and Mr. Zarrinkelk?
	9 A Yes.	9	A No.
12:51:26	10 Q Okay. What's K.Jam House?	12:53:22	10 Q Okay. Now, the fourth -- I'm sorry, the fifth
	11 A I -- I don't know this is, but I have a house	11	entry down reflects a \$941,000 payment to --
	12 account called Kia Jam House account at Wells Fargo.	12	A \$941 payment.
	13 It's probably referring to that, but I don't know what	13	Q I'm sorry. Thank you for correcting me.
	14 this document is, or who drafted it or what -- you know,	14	A \$941 payment to Mr. Zarrinkelk's firm; is
12:51:39	15 so that's my best guess.	12:53:41	15 that correct?
	16 Q Okay. The K.Jam House account, that's an	16	A Yes.
	17 account you use for personal expenses?	17	Q Okay. Let's look at the arrow, the next arrow
	18 A Yes.	18	to the right, from Integrated Administration, and it
	19 Q Okay.	19	goes down to K.Jam Media.
12:51:47	20 A That's the account that typically would loan	12:53:53	20 A Yes.
	21 Integrated Administration money if they were short on	21	Q Do you see that?
	22 bills.	22	A I do.
	23 Q Okay. Do you know why Integrated	23	Q And that reflects an \$89,000 payment to K.Jam
	24 Administration would have been paying K.Jam House	24	Media from Integrated Administration?
12:51:59	25 \$15,000 on November 29, 2011?	12:54:00	25 Do you see that?

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12:54:00	1	A I do see that's what it says.	12:55:58	1	Q That's the name of a law firm?
	2	Q Okay. And K.Jam Media is your company; right?		2	A Yes, it is.
	3	A Yes, it is.		3	Q Okay. Did you have a relationship with that
	4	Q Okay. And if you look at the box that says		4	law firm?
12:54:12	5	K.Jam Media, there's an arrow that goes below, and then	12:56:05	5	A Yes, sir.
	6	there are a list of five individuals, or entities, the		6	Q Okay. And what services did they perform for
	7	first one of which is --		7	you?
	8	A The one that says 8,000?		8	A They perform entertainment legal services.
	9	Q Just let me finish. There's a reference first		9	Q Okay. And were they performing services for
12:54:27	10	to K.Jam House.	12:56:15	10	K.Jam Media at this time?
	11	Do you see that?		11	A They've performed services for me on and off
	12	A Yeah.		12	for the last 15 years.
	13	Q Okay. And K.Jam House you described before as		13	Q Okay. That includes this time period?
	14	your house account?		14	A I would assume so, yes.
12:54:35	15	A Yes.	12:56:30	15	Q Okay. What's Assured employee benefits?
	16	Q And you use that account for -- at least in		16	A One of the insurance policies, I don't remember
	17	part, for personal expenses?		17	if the next two are bills that would come in, I don't
	18	A Yes.		18	remember specifically what for, but they were, I think,
	19	Q Okay. Who's Allen Lee, the name underneath		19	insurance policies or some sort of insurance or
12:54:45	20	K.Jam House?	12:56:46	20	something. I don't remember specifically.
	21	A Allen Lee was a consultant that worked for the		21	Q Okay. So for whom were they providing services
	22	company on and off. He was a financial consultant that		22	for at this time?
	23	would create PowerPoints to financial models,		23	A I don't remember specifically.
	24	projections that David was working on.		24	Q Do you know if they were providing services for
12:54:57	25	Q Okay. He said he worked for the company. What	12:57:00	25	K.Jam Media?
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12:54:58	1	company are you referring to?	12:57:00	1	A I said I don't know specifically.
	2	A He worked for -- he got paid by various		2	Q Okay. You're not sure if they were providing
	3	entities, and he was working for David directly. On one		3	services for Integrated?
	4	or two occasions he might have done things at my		4	A I said I don't remember. My answer is pretty
12:55:09	5	request, but he mostly worked for David's -- at David's	12:57:08	5	clear.
	6	request.		6	Q Okay. How about Merrill & Associates?
	7	Q Did he do work for K.Jam Media?		7	A The same think. That's the same thing as
	8	A He did at some point. I asked him to do some		8	Assured. They were one of those monthly bills. I don't
	9	projections on a financial model for a film slate, I		9	remember specifically what for.
12:55:19	10	think. I don't remember exactly, but yes, he'd done	12:57:15	10	Q Okay. Now if you look to the arrow from K.Jam
	11	some work for K.Jam Media.		11	Media to the right, you'll see a reference to K.Jam
	12	Q Okay. Did anyone have -- were there any		12	Productions.
	13	written agreements reflecting the consulting services		13	A Correct.
	14	that Mr. Lee provided?		14	Q So that's another one of your companies?
12:55:32	15	A I don't remember. There's probably an invoice	12:57:26	15	A Yes, it is.
	16	somewhere for this money that was paid to him.		16	Q And above that arrow there's an indication that
	17	Q Okay. Do you remember whether with respect to		17	\$32,000 was paid from K.Jam Media to K.Jam Productions.
	18	this November -- or strike that.		18	Do you see that?
	19	Do you recall whether with respect to this		19	A I do.
12:55:45	20	transfer from K.Jam Media to Mr. Lee, whether it was for	12:57:38	20	Q Okay. And just to be clear, as it's depicted
	21	services provided to K.Jam Media?		21	in this document, that money is coming from the initial
	22	A I don't recall specifically what he did seven		22	\$300,000 was transferred from Swartz IP to Integrated
	23	years ago.		23	Administration.
	24	Q Okay. What's Business Affairs Inc.?		24	Do you see that?
12:55:57	25	A That's a law firm.	12:57:54	25	A That's what this document states. Yes.

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12:57:56	1 Q Okay. And for K.Jam Productions, if you look	12:59:44	1 one of them or not.
	2 at the arrow going down, the first entry is "L.A. DWP,"		2 Q Okay. Is earthquake insurance something that
	3 and there's an indication that \$247 was paid.		3 you're required to have for your house?
	4 Do you see that?		4 A I don't know if I'm required to have it or not,
12:58:10	5 A I do.	12:59:49	5 but I have it.
	6 Q Okay. What's L.A. WDP [sic]?		6 Q Okay. So this -- and you would make earthquake
	7 A The Department of Water and Power.		7 insurance payments monthly?
	8 Q Okay. So was that a payment for your water and		8 A I don't know.
	9 power bill?		9 Q Okay. You have no recollection of that?
12:58:20	10 A It was for a water and power bill. I don't	12:59:59	10 A I don't know if it's monthly or quarterly. I
	11 know if it was for me or for the office. I don't know.		11 don't know.
	12 Q Which office are you referring to?		12 Q Okay. And the next entry here reflects a \$127
	13 A The office -- wherever we were officed at the		13 payment to DirecTV?
	14 time.		14 Do you see that?
12:58:31	15 Q Colorado Boulevard?	13:00:12	15 A I do.
	16 A Could be. Yes.		16 Q Okay. Did you have DirecTV at this time?
	17 Q Okay. Well, at this time were you using K.Jam		17 A At my house I did, yes.
	18 Productions to pay your personal water and power bill?		18 Q Okay. So does this reflect a payment of \$127
	19 A K.Jam Productions was paying some of my		19 for that DirecTV?
12:58:43	20 personal bills, yes.	13:00:19	20 A It does reflect the \$127 payment to DirecTV,
	21 Q And that would include --		21 yes.
	22 A It could. I just don't know this document. I		22 Q Okay. And was it for the DirecTV at your
	23 don't remember these amounts. You're asking me to		23 house?
	24 verify tractions on a document from eight -- seven,		24 A I could be.
12:58:54	25 eight years ago that I have not generated, I'm looking	13:00:26	25 Q Okay. Did you use K.Jam Productions to pay for
Page 107		Page 109	
12:58:57	1 at for the first time. So I don't know specifically	13:00:28	1 the DirecTV at your house?
	2 which department of water and power that was. Could it		2 A K.Jam Media Productions was used to pay my
	3 have been my house? Yes. Could it have been something		3 bills, but specifically for back then, I don't remember,
	4 else? Yes. I don't know specifically any of those		4 but I would assume so.
12:59:06	5 things from seven years on this document you're just	13:00:35	5 Q It was used to pay your personal bills?
	6 putting in front of me.		6 A Yes, it was.
	7 Q What's the California Earthquake Authority?		7 Q Okay. Who's Daniel Gunning?
	8 A It's the California Earthquake Authority. I		8 A He's a lawyer.
	9 don't know.		9 Q Okay. And was he performing services for you
12:59:15	10 Q Okay. Well, why would a payment have been	13:00:42	10 at this time?
	11 coming from K.Jam Productions to the California		11 A He's performed services for me on and off over
	12 Earthquake Authority for \$684 at this time?		12 the years, yes.
	13 A I don't know. Maybe it's my earthquake		13 Q Okay. Do you recall why you would have made a
	14 insurance.		14 \$250 payment to him at this time?
12:59:28	15 Q Do you have earthquake insurance?	13:00:51	15 A As I said, he was doing work from me, and I'm
	16 A I believe I do.		16 sure I owed him 250 bucks and I paid him.
	17 Q Okay. And is that insurance that you have for		17 Q Okay. But you have no specific recollection as
	18 yourself personally?		18 to the nature of that work?
	19 A For my house.		19 A The work had to do with, uh -- the last thing
12:59:35	20 Q For your house?	13:01:04	20 he did for me was a matter involving a judgment that I
	21 A Yes.		21 have against somebody for -- for something from many,
	22 Q Okay. Would the office have had earthquake		22 many years ago.
	23 insurance?		23 Q That's the last work that you recall him doing
	24 A I don't know. The office had a bunch of		24 for you?
12:59:41	25 insurances. I don't know if earthquake insurance was	13:01:23	25 A Yes.

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13:01:23	1	Q And that was for you personally?	13:03:23	1	and is attached hereto.)
	2	A Yes.		2	BY MR. LATZER:
	3	Q Okay. And do you believe that that was the		3	A Okay.
	4	work he was performing at this time?		4	Q And it Exhibit 14 is another exhibit introduced
13:01:28	5	A I believe so.	13:03:30	5	by the government at Mr. Bergstein's criminal trial, and
	6	Q Okay. So was that the last time he performed		6	this one is designated Exhibit 47.
	7	work for you?		7	Do you see that?
	8	A That matter is ongoing.		8	A I do.
	9	Q That matter is still ongoing?		9	Q Okay. Have you seen this document before?
13:01:37	10	A Yes.	13:03:40	10	A No.
	11	Q And what's the nature of that matter?		11	Q Now, we see on first page here, a transfer from
	12	A It's, uh -- I have a judgment against this guy		12	Swartz IP Services Group to Integrated Administration
	13	and I've been trying to collect on forever, and he's		13	for \$250,000 on December 8th, 2011.
	14	helping to do that.		14	Do you see that?
13:01:45	15	Q And how much is that judgment for?	13:03:59	15	A That's what it says.
	16	A 40,000 bucks, I think, 40 something.		16	Q Okay. And this is one of transfers that's
	17	Q That's a judgment that you obtained in your		17	reflected on the bank statement that we reviewed before?
	18	name personally?		18	A If you say so.
	19	A I believe so. Yes.		19	Q Let me ask you this. At -- at or around this
13:01:56	20	Q Okay. The arrow from K.Jam Media going up	13:04:24	20	time frame, did Integrated Administration have any other
	21	toward the right, you see there's a reference to \$8,000?		21	bank accounts other than this Wells Fargo account ending
	22	A I do.		22	in 1578?
	23	Q And the circle there connecting to that arrow		23	A No.
	24	has your name; correct?		24	Q It didn't?
13:02:18	25	A Yes, it does.	13:04:33	25	A I don't think so. It had a savings account
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13:02:18	1	Q And underneath that there's a reference to	13:04:36	1	attached to this, I think, at the time, but that's all I
	2	"credit card, 1K."		2	can remember right now.
	3	Do you see that?		3	Q Okay. Do you know if that savings account
	4	A I do.		4	received any monies from Swartz IP?
13:02:25	5	Q So that was -- or this is indicating that	13:04:45	5	A I don't. It was not an active account. It
	6	\$1,000 went toward the credit -- a credit card bill?		6	just kind of sat there. When you open one, you get the
	7	A That's what it seems to say.		7	other, I think.
	8	Q And that's the black Amex card that we've been		8	Q Okay. Can you turn to the last page of this --
	9	referring to?		9	A Yes, sir.
13:02:38	10	A I have no idea.	13:04:53	10	Q -- please?
	11	Q Okay. I believe you testified earlier that the		11	A Okay.
	12	only credit card we would see today is the black Amex?		12	Q Okay. So on the last page, we again see what
	13	A The only Amex we would talk about is the black		13	was reflected on the first page, and that's that there
	14	Amex. This could have been another credit card.		14	was a payment from Swartz IP Services Group to
13:02:49	15	Q Okay. Did -- you had other credit cards in	13:05:08	15	Integrated Administration for \$250,000 on December 8,
	16	your name at that time?		16	2011.
	17	A Yes, I did.		17	Do you see that?
	18	Q Okay. And approximately how -- how many other		18	A Yeah.
	19	credit cards?		19	Q Okay. Now, if you can look at box that states
13:02:55	20	A I have no idea.	13:05:19	20	Integrated Administration, you will see a number of
	21	Q More than five?		21	arrows going from that box?
	22	A Don't know.		22	A Yes, I do.
	23	Q Okay. Let's look at Exhibit 14.		23	Q Okay. Now the arrow pointing down toward the
	24	(Exhibit 14 was marked for		24	bottom right reflects a \$44,000 payment from Integrated
13:03:23	25	identification by the Court Reporter	13:05:32	25	Administration to K.Jam Media.

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13:05:33	1 Do you see that?	13:07:28	1 Q Okay. Were you making a \$40,000 salary at this
	2 A I do.		2 from Integrated Administration?
	3 Q So that's a \$44,000 payment to your company?		3 A I would get paid very intermittently. This
	4 A That's correct.		4 could have been a payment and I maybe didn't have a
13:05:39	5 Q Do you know why Integrated Administration would	13:07:38	5 payment for the six months before that. So I'm assuming
	6 have been paying K.Jam Media \$44,000 at this time?		6 that's what maybe all or part of this was for. I don't
	7 A So many of the bills were in K.Jam Media's		7 know. Maybe part of it it's a loan payoff, I don't
	8 name, like I said, including the rent, the office, the		8 know. But I'm just pointing out that my personal
	9 lease for the copier, et cetera, et cetera. So probably		9 paycheck would be written from Integrated Administration
13:05:52	10 covering bills that way.	13:07:50	10 to K.Jam Productions. And when there wasn't money, I
	11 Q So from your perspective, you really didn't		11 wouldn't take a check --
	12 care at this time where money was coming from as long as		12 Q Okay.
	13 you had the money to pay the bills?		13 A -- which was more often than not.
	14 A David was providing the funding. I didn't		14 Q All right. I believe you testified that you
13:06:13	15 question him where the money was coming from. I trusted	13:07:58	15 received a salary from Integrated Administration
	16 him at the time. I would ask for money. When he		16 intermittently?
	17 provided money, he would tell me how much to go to which		17 A Yes.
	18 entity and what to do with it.		18 Q And when there was money there, you'd take it?
	19 And in this case, I'm assuming this \$44,000		19 A Yes.
13:06:22	20 that went K.Jam Media was to pay corporate bills,	13:08:06	20 Q Okay. So can you tell me, approximately, how
	21 including rent and, you know, insurance, and health		21 much per month during the times you were receiving a
	22 insurance, and office, and blah, blah.		22 salary that you were -- that you were being paid?
	23 Q Okay. Would any of the K.Jam Media payments		23 A What my salary was?
	24 gone toward any personal expenses?		24 Q Yes.
13:06:36	25 A I don't know, maybe. I don't know. I don't	13:08:17	25 A My total salary was probably around 250,000,
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13:06:41	1 recall.	13:08:17	1 200, \$250,000, if I were to get all the checks.
	2 Q But at that time there were -- there would be		2 Q And that's \$250,000 per year?
	3 certain instances where payments would go from K.Jam		3 A Per year. I'm guessing that amount. I don't
	4 Media toward personal expenses?		4 remember specifically, 200 or 250,000. Something like
13:06:49	5 A Maybe. Yeah.	13:08:32	5 that.
	6 Q Now the next arrow from Integrated		6 Q And your testimony is that salary would have
	7 Administration reflects a \$40,000 payment to Kia Jam		7 been paid to Kia Jam Productions?
	8 Productions.		8 A Yes.
	9 Do you see that?		9 Q Okay. Is there another -- are there any other
13:06:59	10 A Uh-huh. I do.	13:08:41	10 reasons why \$40,000 would have been transferred for --
	11 Q Okay. Do you know why Integrated		11 to Integrated -- from Integrated Administration to Kia
	12 Administration would be transferring \$40,000 to Kia Jam		12 Jam Productions?
	13 Productions at this time?		13 A As I articulated, I don't remember
	14 A No. It could have been my payroll. My		14 specifically, but it could have also been a loan
13:07:09	15 payroll, actually, would be written Kia Jam Productions,	13:08:50	15 payoff. Maybe Kia Jam Productions gave a loan to
	16 so that's what this could have been. I don't recall.		16 Integrated Administration for bills or payroll in the
	17 Q You're referring to your payroll. What do you		17 weeks or months before. I don't remember specifically
	18 mean by that?		18 that happened often.
	19 A When I would get a paycheck, the check would be		19 Q So there's a lot of money moving around at this
13:07:18	20 written out Kia Jam Productions.	13:09:05	20 time?
	21 Q And who would you get a paycheck from?		21 A You -- you see what's happening.
	22 A Integrated Administration.		22 Q U-huh. And there's money flowing from one
	23 Q You're saying a paycheck for your salary		23 entity to the next, and they're entities which you and
	24 personally?		24 Mr. Bergstein were affiliated or had an interest; is
13:07:28	25 A Yes.	13:09:18	25 that correct?

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13:09:18	1 A I am -- I have -- these three entities are	13:12:06	1 discussed earlier, a payment of \$50,000 from Swartz IP
	2 entirely mine. David Bergstein doesn't own any of these	2	Services to Integrated Administration on February 2nd,
	3 entities. And yes, my entities would loan money to the	3	2012?
	4 other entities, to IA if it needed money. If I had	4	A That's what it seems to do, yes.
13:09:24	5 money, I would loan money to IA when it needed money to	13:12:16	5 Q Okay. Let's turn, if you can, to the second to
	6 make payroll, and health insurance, and parking, and	6	the last page of this exhibit.
	7 things of that sort. That's what small businesses do.	7	A Yes, sir.
	8 Q What do small businesses do?	8	Q And this, again, reflects the payment that we
	9 A You take care of your business, if you can. If	9	just discussed, and that's the \$50,000 payment from
13:09:44	10 I had \$5,000 in my account and Integrated Administration	13:12:32	10 Swartz IP to Integrated Administration on February 2nd,
	11 needed \$5,000 to make sure the parking gate would open,	11	2012.
	12 people could come and park, I would advance the money as	12	Do you see that?
	13 a loan to the company, and when the company had money,	13	A Okay. I do.
	14 it would pay me back.	14	Q And then you see the two arrows, one to K.Jam
13:09:55	15 If we were short for payroll, I would advance	13:12:42	15 Productions and the other to K.Jam Media?
	16 the money, if I had it, so we can make payroll, people	16	A I do.
	17 could get paid, people could have health benefits.	17	Q Okay. So this first arrow going down reflects
	18 Q Did Kia Jam Productions pay any of the bills	18	that at this time Integrated Administration paid \$33,000
	19 that you were referring to before that Integrated	19	to K.Jam Media.
13:10:18	20 Administration had?	13:12:58	20 A Okay.
	21 A I don't remember. Maybe K.Jam Productions	21	Q Do you see that?
	22 loaned money to IA to pay the bills, or how it got paid,	22	A I do.
	23 I don't remember from seven years ago.	23	Q Do you know the purpose of that payment from
	24 Q Let's look at Exhibit 15.	24	Integrated to K.Jam Media?
13:10:53	25 (Exhibit 15 was marked for	13:13:05	25 A It says on here, according to this document,
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13:10:53	1 identification by the Court Reporter	13:13:07	1 that it paid for the rent, the parking, the IT guy,
	2 and is attached hereto.)	2	office supplies, the phone bill and \$13,000 to my house
	3 BY MR. LATZER:	3	account.
	4 Q And Exhibit 15 is another exhibit introduced at	4	Q Okay. So let's look at that. \$13,000 went
13:10:59	5 Mr. Bergstein's criminal trial. The exhibit was	13:13:19	5 toward the K.Jam House account.
	6 numbered 50, and it was introduced by the government.	6	Do you see that?
	7 Have you seen this document before?	7	A I do.
	8 A No, sir.	8	Q And --
	9 Q Okay. And you'll see on the first page of this	9	A I'm assuming that's paying back a loan that I
13:11:13	10 exhibit, a payment, or what reflects a payment from	13:13:28	10 had given to the company.
	11 Swartz IP Services Group of \$50,000 to Integrated	11	Q Okay. Why are you assuming that?
	12 Administration on February 2nd, 2012.	12	A Because this document is from six years ago,
	13 Do you see that?	13	and that's my best recollection of it.
	14 A That's what the document says.	14	Q But you also testified earlier that K.Jam House
13:11:27	15 Q Okay. Do you recall a payment from Swartz IP	13:13:39	15 was an account that you used for personal expenses?
	16 to Integrated of \$50,000 at this time?	16	A Right. But that's the account that I would use
	17 A I think -- didn't we talk about this one	17	also to loan money to the company if the company needed
	18 already? I think we went through all of these	18	money.
	19 individually already, didn't we, or are these new	19	Q Okay. But this could have been paying back
13:11:37	20 transfers?	13:13:50	20 personal expenses?
	21 Q So if you look back at Exhibit 40, page 31, you	21	A No.
	22 see a payment of \$50,000 from -- on February --	22	Q It couldn't have been?
	23 A I do. I think we talked about this already,	23	A Paying back personal -- no. It either -- I
	24 earlier before lunch.	24	either got paid by getting a paycheck to K.Jam Media.
13:12:03	25 Q Okay. So this -- this reflects what we	13:13:58	25 That was how I got paid. Money going to the house

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13:14:01	1	account, this was most likely a loan payback, but I'm	13:15:30	1	A Adam was one of the IT guys. Adam, at the time
	2	not sure.		2	was, I believe, doing some web work for the company. I
	3	Q Okay. And there's a reference to a \$658		3	think.
	4	payment to Verizon.		4	Q For what company?
13:14:08	5	Do you see that?	13:15:39	5	A For either K.Jam Media or I don't know what
	6	A Yes, I do.		6	else he was doing. But he was a IT guy, so he did IT
	7	Q And what -- what was that payment for?		7	work. But he did some web work for me, yes.
	8	A I don't know. I think that was -- our phone		8	Q I believe you testified yesterday that
	9	bill at the office was Verizon, I think. I'm not sure.		9	Mr. Bergstein's friend, Mr. Carroll was also providing
13:14:17	10	I don't recall.	13:15:55	10	IT work?
	11	Q Was Verizon the phone provider at the office?		11	A Yes, he did.
	12	A I think so.		12	Q What -- what was the nature of the work he
	13	Q Was Verizon the phone provider for you		13	provided?
	14	personally?		14	A He did -- he handled all the phones and IT
13:14:25	15	A No, I don't think so. I had AT&T at the house,	13:16:01	15	work. There was another guy, Farden, who provided IT
	16	or something else. I don't think it's Verizon.		16	work. There was always multiple parties doing IT work
	17	Q Did you have Verizon back at this time, in		17	for the companies.
	18	2012?		18	Q How come you needed so much IT work?
	19	A I haven't changed my home phone bill in a long		19	A I don't understand that business. It needs --
13:14:33	20	time. This was, I believe a company.	13:16:13	20	stuff needed to get done, and we would hire people to
	21	Q How about your cell phone?		21	come and do the work that needed to get done. The
	22	A My cell phone was AT&T.		22	phones were all online, too, some voiceover phone IT
	23	Q And was it AT&T at this time?		23	system thing.
	24	A It's been with AT&T for a very long time.		24	Q And there's a reference here to a payment of
13:14:43	25	Q Okay. Have you ever had Verizon as a phone	13:16:26	25	\$273 to Office Depot.
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13:14:45	1	provider?	13:16:28	1	Do you see that?
	2	A I think at the office it was Verizon, yes.		2	A I do.
	3	Q Okay. What's Colorado or -- I'm sorry, C. A.		3	Q And do you know K.Jam Media would have been
	4	Colorado Center?		4	paying \$273 to Office Depot at this time?
13:14:52	5	A That's the office rent. That's the name of the	13:16:37	5	A Probably to buy office supplies for the office.
	6	landlord where we wrote the check to for the office rent		6	Paper, staples, pens.
	7	for the Colorado rent space.		7	Q And that's the office that you shared with
	8	Q Okay. So you were paying \$15,000 per month in		8	Mr. Bergstein?
	9	rent?		9	A That's the only office, yes.
13:15:01	10	A Yes, sir.	13:16:48	10	Q Okay. Now up top, the reference to Kia Jam
	11	Q And that was for the office that you shared		11	Productions, we see that \$18,000 went from Integrated
	12	with Mr. Bergstein?		12	Administration to Kia Jam Productions.
	13	A That is correct.		13	Do you see that?
	14	Q And the charge, the standard parking for		14	A Correct. I do. I see that.
13:15:08	15	\$3,000, what's that?	13:16:58	15	Q Okay. And then there was a payment of \$18,000
	16	A That's for parking in the building where the		16	to Mr. Zarrinkelk?
	17	office was.		17	A That's correct.
	18	Q Okay. And so how --		18	Q Okay. Do you know why Mr. Zarrinkelk would
	19	A We get a number of spots per month. We had to		19	have been receiving \$18,000 Kia Jam Productions at this
13:15:20	20	pay for the number of parking spots that we had so that	13:17:10	20	time?
	21	the employees could have a place to park.		21	A I'm going to guess Mr. Zarrinkelk loaned money
	22	Q Do you recall approximately how many spots you		22	to me all the time when I needed money for company
	23	had?		23	stuff. He probably loaned Kia Jam Productions the
	24	A No, I don't.		24	money, I moved the money to IA, and then IA paid me back
13:15:29	25	Q Okay. Who is Adam Dunode?	13:17:23	25	and I paid him back. That's what I'm guessing it was.

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13:17:26	1 Q Did you have any -- at any point in time when	13:19:41	1 Integrated Administration, the first of which is toward
	2 Mr. Zarrinkelk loaned money, did you have any agreement,		2 the top, a \$5,000 payment to K.Jam Media.
	3 written agreement, reflecting that loan arrangement?		3 Do you see that?
	4 A On once -- on one or two occasions I believe we		4 A Yes.
13:17:39	5 did, but on 98 percent of the occasions, we did not. I	13:19:50	5 Q Okay. Now, do you know why Integrated would
	6 would just call him and ask him and he would graciously		6 have been making a \$5,000 to the K.Jam Media at this
	7 agree to help me. He has been doing that for years.		7 time?
	8 Q Does he still do that today?		8 A I'm sure to pay bills.
	9 A He's a good man. I'm sorry?		9 Q And whose bills are you referring to?
13:17:51	10 Q Does he still do that today?	13:20:02	10 A Corporate bills, company bills, Kia Jam Media
	11 A To the extent that he can, and I ask him, yes,		11 bills probably.
	12 I still owe him a little bit of money. Yes.		12 Q And there's another arrow goes to the right of
	13 Q Let's look at Exhibit 16.		13 the K.Jam Media box, and it's -- reflects a payment of
	14 A Okay.		14 \$750 to T-Mobile?
13:18:16	15 (Exhibit 16 was marked for	13:20:14	15 Do you see that?
	16 identification by the Court Reporter		16 A That's correct. Yes.
	17 and is attached hereto.)		17 Q So --
	18 BY MR. LATZER:		18 A I think my cell phone was -- I had a T-Mobile
	19 Q And Exhibit 16 is another exhibit from		19 cell phone as well. I think somehow that, as I said
13:18:20	20 Mr. Bergstein's criminal trial. This is a government	13:20:21	20 earlier, AT&T -- AT&T is my current carrier. Back then
	21 Exhibit 53.		21 it might have been T-Mobile. I think I just remember,
	22 And on first page here you see a \$300,000		22 when I switched to an iPhone, I had to switch to AT&T.
	23 payment from Swartz IP Services Group to Integrated		23 So I want to correct what I said a few minutes ago about
	24 Administration that was on March 6, 2012?		24 my cell -- my personal cell phone.
13:18:37	25 A I see that.	13:20:32	25 Q Fair enough. So you think that this was a
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13:18:38	1 Q Okay. And this is one of the payments that	13:20:36	1 payment for your personal cell phone bill?
	2 we've previously looked at on the bank statements?		2 A My company cell phone.
	3 A If you say so.		3 Q It's your accompany cell phone?
	4 Q Let's take a look at page 36 of Exhibit 40.		4 A What I would use for work, yes.
13:18:59	5 A Okay.	13:20:43	5 Q Okay. And you use it for personal use, too?
	6 Q Do you see the first transaction on that page		6 A Of course.
	7 reflects a transfer of \$300,000 --		7 Q Okay. And what's the Office of Finance, the
	8 A I do.		8 entry right below that?
	9 Q -- from Swartz IP Services Group to Integrated		9 A I don't know.
13:19:11	10 Administration on March 6th?	13:20:50	10 Q Okay. It reflects \$145 payment. You don't
	11 A I do.		11 know what that's for?
	12 Q Okay. So that's also reflected on this		12 A No, I don't.
	13 cover --		13 Q Okay. Now, in the middle of the page, we see
	14 A This is the one we've talked about already.		14 the arrow toward the right, from Integrated
13:19:18	15 Yes.	13:20:59	15 Administration, which reflects a \$149,000 payment to Kia
	16 Q Okay. Take a look, please, at the last page of		16 Jam Productions.
	17 this exhibit.		17 Do you see that?
	18 A No problem.		18 A Uh-huh. Yes, I do.
	19 Q And this last page also reflects what we saw on		19 Q And if you keep going toward the right, you see
13:19:30	20 the first page, a \$300,000 payment from Swartz IP to	13:21:08	20 that \$149,000 was then paid to you.
	21 Integrated Administration --		21 Do you see that?
	22 A Okay.		22 A Yes. For American Express.
	23 Q -- do you see that?		23 Q And that's the American Express black card that
	24 A Okay. Yeah.		24 we've been referring today?
13:19:36	25 Q And then we see multiple arrows going from	13:21:19	25 A Yes.

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13:21:20	1 Q Okay. And the next arrow from Integrated	13:23:16	1 Exhibit 17?
	2 Administration reflects a \$63,000 payment to		2 A Yes, sir.
	3 Mr. Zarrinkelk.		3 Q Okay. And then the second payment on this page
	4 Do you see that?		4 is \$186,000 from Swartz IP to Malibu Escrow Corp.
13:21:31	5 A Yes.	13:23:22	5 Do you see that?
	6 Q Do you know what that's a reference to?		6 A I do.
	7 A It's says "Wire to Carol Watson."		7 Q Do you know what that payment was for?
	8 Q Okay. So --		8 A No. It had nothing to do with the Swartz IP
	9 A We looked at that earlier.		9 bank account. I have no idea what that was for.
13:21:39	10 Q That's the \$63,000 that was --	13:23:34	10 Q Do you know what Malibu Escrow Corp. is?
	11 A Yeah. He sent an e-mail instructing us to		11 A I I'm assuming it's an escrow corporation in
	12 send -- he said I'm sending in \$300,000. Send \$63,000		12 Malibu, but that's just based on the name. I don't
	13 to Carol auction thing.		13 know, though.
	14 Q Okay. So that's one of the payments for which		14 Q Do you know if Mr. Bergstein was purchasing
13:21:52	15 Mr. Zarrinkelk was serving as the facilitator?	13:23:45	15 property in Malibu at this time?
	16 A That is correct.		16 A I don't know what David was doing.
	17 Q Okay. Now the last entry toward the bottom		17 Q Let's turn to the last page of this exhibit,
	18 reflects a \$25,000 payment to National Financial		18 please.
	19 Services.		19 Now this last page also reflects what we saw in
13:22:03	20 Do you see that?	13:24:07	20 the first page, and that's a \$50,000 payment from Swartz
	21 A I do.		21 IP Services Group to Integrated on March 13, 2012.
	22 Q What's National Financial Services?		22 A Okay.
	23 A I don't know.		23 Q Do you see that?
	24 Q Do you have any idea why a \$25,000 payment		24 A I do.
13:22:10	25 would have been made from your company to National	13:24:15	25 Q And let's look at the arrow toward the right.
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13:22:13	1 Financial Services at this time?	13:24:20	1 It reflects a \$30,000 payment to K.Jam Media?
	2 A I'm sure I did it at David's instructions.		2 A Yes, sir.
	3 Q Let's look at Exhibit 17.		3 Q Okay. And then to the right of that you see
	4 (Exhibit 17 was marked for		4 that list of various payments?
13:22:32	5 identification by the Court Reporter	13:24:32	5 A Yes, sir.
	6 and is attached hereto.)		6 Q What's Stanton & Associates?
	7 BY MR. LATZER:		7 A I think one of the insurances, I couldn't
	8 Q Now, Exhibit 17 is another government exhibit		8 afford to pay it all at once, and I financed it. I
	9 introduced at Mr. Bergstein's criminal trial. It's		9 think this was a payment on that. It's somehow tied to
13:22:42	10 Exhibit 54.	13:24:46	10 one of the insurance policies.
	11 A Okay.		11 Q What insurance are you referring to?
	12 Q And you see on the first page two payments, one		12 A There was a bunch of insurances. I don't know
	13 from Swartz IP Services Group for \$50,000 to Integrated		13 specifically which this was, but EPLI, employer, blah,
	14 Administration.		14 blah, one of those insurances. It could have been that.
13:22:56	15 Do you see that?	13:25:03	15 I don't know what it was, but one of the insurance
	16 A Yes.		16 policies. I don't remember.
	17 Q Okay. Now, if you look again at Exhibit 40,		17 Q That's insurance for Integrated?
	18 page 36 --		18 A I don't remember specifically.
	19 A Okay.		19 Q Okay. Now there's an entry right below that to
13:23:05	20 Q -- on March 13, 2012 you see --	13:25:13	20 AT&T, and I believe you testified before that you --
	21 A I see it.		21 AT&T was your provider for your home?
	22 Q -- there was a payment of \$50,000 from		22 A AT&T is my current provider for my cell phone.
	23 Integrated Administration?		23 AT&T back then was either the provider for the office,
	24 A I do.		24 Internet office phone something. I don't remember
13:23:13	25 Q Okay. And that's also reflected on plaintiff's	13:25:36	25 specifically what, one those things.

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<p>13:25:41 1 Q Do you recall whether -- when AT&T became your 2 cell phone provider?</p> <p>3 A I think, if I remember correctly, when I got an 4 iPhone, which was -- I was late to the iPhone thing, a 13:25:53 5 couple years ago I switched from an Android to iPhone, 6 and I think that's when it became my carrier, I think.</p> <p>7 Q Okay. Now --</p> <p>8 A Two years ago maybe. A year and a half ago.</p> <p>9 Q -- before I believe you testified that Verizon 13:26:10 10 was providing phone services for the office.</p> <p>11 A Yeah. The phone and Internet, I think, were 12 different at the office. One of them was one, and one 13 was the other, I think. I don't remember which was 14 which.</p> <p>13:26:18 15 Q So your testimony is that you providing -- or 16 paying AT&T and Verizon for phone and/or Internet 17 services at this time?</p> <p>18 A That is my recollection of it, yes. I could be 19 wrong, but that's what I think it is.</p> <p>13:26:29 20 Q Okay. And below AT&T there's a payment to 21 Mr. Poormand.</p> <p>22 Do you see that?</p> <p>23 A Yes. Yes.</p> <p>24 Q And he's your uncle?</p> <p>13:26:36 25 A Yes.</p>	<p>13:27:36 1 A I believe so, yeah.</p> <p>2 Q You've got three different providers?</p> <p>3 A I -- I don't know they were multiple providers. 4 Maybe one of them was a provider of something for the 13:27:41 5 house. I don't know. I don't remember.</p> <p>6 Q And by "house," you're referring to your 7 personal house?</p> <p>8 A Yes. My -- my residence. But I have DirecTV 9 at the house, so it wouldn't haven't been -- Time Warner 13:27:54 10 wouldn't have been for my house. I've had DirecTV for a 11 a very long time at home. I still do. So I don't know 12 what Time Warner was for. It was for -- maybe the long 13 distance carrier was different. I didn't really deal 14 with this. Steve Piscula did.</p> <p>13:28:08 15 Q Uh-huh.</p> <p>16 A Maybe the long distance carrier was different 17 than the regular phone provider. I don't know.</p> <p>18 Q Now this document also reflects that there was 19 a \$30,000 payment from Integrated to Kia Jam Media; 13:28:26 20 right?</p> <p>21 A Okay.</p> <p>22 Q And then it appears to show an arrow going back 23 to Integrated Administration, which reflects a payment 24 of \$7,000 to Integrated Administration from Kia Jam 13:28:37 25 Media.</p>
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<p>13:26:36 1 Q Okay. And you were paying him \$300?</p> <p>2 A Yes.</p> <p>3 Q Okay. Do you recall why you were paying your 4 uncle \$300 at this point?</p> <p>13:26:42 5 A He was a runner. I've been trying to help him. 6 He's been a runner at the office on and off, so he got 7 paid for -- whether it was miles he was driving, or, I 8 don't know what this is -- maybe he even bought 9 something, but he was a runner for the office.</p> <p>13:26:54 10 Q What do you mean by "a runner"?</p> <p>11 A Go pick -- just drive, or go pick this up, 12 deliver this, drive here. Get groceries. Whatever. 13 Pick up office supplies. That type of stuff.</p> <p>14 Q Okay. And there's a charge here for Time 13:27:08 15 Warner for \$400.</p> <p>16 Do you see that?</p> <p>17 A Yes.</p> <p>18 Q Who was using Time Warner at this time?</p> <p>19 A I don't remember. I don't know. Time Warner 13:27:16 20 could have been, you know, again, either the phone, or 21 Internet, or one those things. I don't know.</p> <p>22 Q So your recollection is that AT&T, Verizon, and 23 perhaps Time Warner, were all providing cable or -- I'm 24 sorry, Internet or phone services to your company at 13:27:36 25 that time?</p>	<p>13:28:37 1 Do you see that?</p> <p>2 A I do.</p> <p>3 Q Do you have understanding why Kia Jam Media was 4 paying back \$7,000 to Integrated Administration?</p> <p>13:28:43 5 A I don't. Don't recall.</p> <p>6 Q Were there times when K.Jam Media paid money to 7 Integrated Administration?</p> <p>8 A There were times where K.Jam Media would cover 9 the shortfall for Integrated Administration.</p> <p>13:28:55 10 Absolutely. It was 10 days later, so maybe Integrated 11 Administration was short money and K.Jam floated it 12 money.</p> <p>13 Q Let's take a look at 18. 14 (Exhibit 18 was marked for 13:29:38 15 identification by the Court Reporter 16 and is attached hereto.)</p> <p>17 BY MR. LATZER:</p> <p>18 Q And Exhibit 18 is another exhibit introduced by 19 the government at Mr. Bergstein's criminal trial, 13:29:51 20 specifically Exhibit No. 95.</p> <p>21 And the title of this exhibit on the top left 22 is "Select TT Recipient Entities." 23 Do you see that?</p> <p>24 A Yes.</p> <p>13:30:04 25 Q And the first entity listed on this document is</p>

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13:30:09	1 Integrated Administration. 2 Do you see that? 3 A I do. 4 Q And it reflects that Integrated Administration 13:30:17 5 received \$2,529,732. 6 Do you see that? 7 A That's what it says. 8 Q Okay. Do you know if Integrated Administration 9 received from Swartz IP \$2,529 and 7 -- \$2,529,000 -- 13:30:35 10 I'm having a tough time here. 11 A 2,529,732. 12 Q That's right. Do you know if Integrated 13 Administration received those monies from Swartz IP? 14 A I don't. 13:30:50 15 Q Okay. Do you have any reason to believe that 16 Integrated Administration did not receive that amount 17 from Swartz IP? 18 A Yesterday the documents that your colleague 19 showed me was, like, a little over a million dollars. 13:31:00 20 There was probably more, but I don't know the amount, so 21 I don't know if this amount is correct or not correct. 22 Q Let's take a look at Exhibit 19. 23 (Exhibit 19 was marked for 24 identification by the Court Reporter 13:31:28 25 and a copy is attached hereto.)	13:32:36 1 Q And those services included -- 2 A So when I said 250 earlier, I was clearly 3 wrong. So -- 4 Q Okay. And those services included following 13:32:54 5 Mr. Bergstein's instruction to wire money to various 6 entities and individuals? 7 A Yes. 8 Q What other services did you provide? 9 A I was out trying to do things, look at deals, 13:33:07 10 looking at deals, evaluating deals, trying to do 11 consultant for Broadway 4D, trying get movies made, 12 which I did, and generated revenue, and worked on 13 Sovrin. You know, whatever needed to be done. 14 Q Okay. I'm just trying to understand, of those 13:33:23 15 services that you just described, what does that have to 16 do with Integrated Administration's payroll services 17 you've described? 18 A Integrated Administration was the company that 19 did the payroll, as I've said. So my payroll, for work 13:33:39 20 I was doing, was apparently these checks, and they came 21 to me because of the work I was doing. 22 Q Right. But I'm just trying to understand the 23 relationship of the work that you said that you were 24 doing to Integrated Administration's business functions. 13:33:54 25 What specifically did those services have to do	
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13:31:28 1 BY MR. LATZER: 2 Q And Exhibit 19 is another exhibit from 3 Mr. Bergstein's criminal trial, Exhibit No. 84. 4 A Okay. 13:31:38 5 Q And the title of this document is "Periodic 6 Payments to Kiarash, K.Jam, for Integrated -- from 7 Integrated Administration for August 17, 2011 to May 18, 8 2012." 9 Do you see that? 13:31:52 10 A Yes. 11 Q And have you seen this document before? 12 A No, sir. 13 Q Okay. So this reflects that from August 17, 14 2011 to May 18, 2012, you received total of \$167,753 13:32:07 15 from Integrated Administration? 16 A That's what it says. 17 Q Okay. Do you believe that you did, in fact, 18 received \$167,753 during this time period? 19 A It sounds about right. I don't know. But 13:32:23 20 sure. 21 Q Okay. And why did you receive these monies? 22 A This was my paycheck. 23 Q This was a paycheck that you received for 24 services that you were performing for Integrated? 13:32:35 25 A Yes.	13:33:59 1 with payroll? 2 A I'm sorry. I don't understand your question. 3 Q So integrated Administration, as you've 4 described it, at least in part, is a payroll company? 13:34:08 5 A Yes. 6 Q So what payroll related services are you 7 performing for Integrated Administration -- 8 A Operating Integrated -- 9 Q Just let me finish. 13:34:15 10 A Sorry. 11 Q What payroll related services are you 12 performing for Integrated Administration that would 13 entitle you to receive these monies? 14 A My agreement was that apparently, I think it 13:34:23 15 was 200, not 250, like I said, was my salary, and part 16 of what David was funding was money coming into IA, and 17 when there was money I would take a check. When there 18 wasn't money, I wouldn't take a check. 19 Q I don't think that answers the question, 13:34:37 20 though. 21 What services, other than following 22 Mr. Bergstein's instructions to transfer monies around, 23 what services, what payroll related services were you 24 performing for Integrated Administration that this time? 13:34:51 25 A I'll give you an example. I was consulting for		

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<p>13:34:53 1 Broadway 4D, I think, on or around this time, and was 2 bringing in money that would go towards making these 3 payroll checks. I was getting paid on a monthly basis 4 for consulting there.</p> <p>13:35:02 5 I think this was right around the time I went 6 out of the country to make a movie. That generated a 7 free -- a fee that I brought in to help all these. So I 8 did everything and anything that needed to be done.</p> <p>9 Q Were you providing payroll related consulting 10 services to Broadway 4D?</p> <p>11 A No. Just consulting services. I don't 12 understand what you mean "payroll related services."</p> <p>13 Q Well, Integrated Administration was a payroll 14 company?</p> <p>13:35:21 15 A That's one of the things it did. It provided 16 overhead services, and payroll and employees, yes.</p> <p>17 Q So what did your work for Broadway 4D have to 18 do with a payroll company?</p> <p>19 A My work for Broadway 4D generated money that 13:35:33 20 came into the companies, including AI, to pay these 21 payments.</p> <p>22 Q To pay these payments to yourself?</p> <p>23 A Payments to everybody. As I said, if there 24 wasn't money for me to take it, I wouldn't take it. I 13:35:46 25 made sure everybody else got paid first.</p>	<p>13:36:58 1 A Ed Defrank and Robert Silverman, and one other 2 guy, the CEO's name whom I can't remember right now.</p> <p>3 Q Okay. And what experience did you have at that 4 time with medical billing --</p> <p>13:37:13 5 A None.</p> <p>6 Q -- if any? You had none?</p> <p>7 A None whatsoever.</p> <p>8 Q Okay.</p> <p>9 A I had nothing to do the operation of Sovrin. I 13:37:20 10 did not have anything to do with the operation of the 11 medical billing company.</p> <p>12 Q So you just established the entity?</p> <p>13 A Established the entity, and we provided the 14 employees and paid the employees that were working 13:37:28 15 there. And paid for the rent, and the office, and the 16 Internet, and blah, blah.</p> <p>17 Q So were you an officer of Sovrin how?</p> <p>18 A I believe so.</p> <p>19 Q Do you recall your position?</p> <p>13:37:38 20 A I don't.</p> <p>21 Q Okay. Do you know who, if any -- were there 22 any other officers of Sovrin?</p> <p>23 A I don't remember the corporate structure of 24 Sovrin.</p> <p>13:37:47 25 Q Okay. Did you have an ownership interest in</p>
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<p>13:35:59 1 Q Now, you've made a number of references today 2 to Sovrin; is that correct?</p> <p>3 A Yes, I have.</p> <p>4 Q Okay. And what is Sovrin?</p> <p>13:36:09 5 A Sovrin was a company set up to get into the 6 medical billing industry.</p> <p>7 Q Okay. And when was it set up?</p> <p>8 A I don't remember the date. Somewhere around 9 that time.</p> <p>13:36:23 10 Q That was a company that you and Mr. Bergstein 11 set up?</p> <p>12 A I set up.</p> <p>13 Q You set it up?</p> <p>14 A I believe so, yes.</p> <p>13:36:29 15 Q Okay. Did Mr. Bergstein have any involvement 16 with Sovrin?</p> <p>17 A Yes. He's the one who got the business. It 18 was his idea. He and, I think, the Weston guys who came 19 up with plan to do this business, and it was a good 13:36:42 20 opportunity.</p> <p>21 Q So was this a business that you, Mr. Bergstein, 22 and the Weston guys were running together?</p> <p>23 A No, we were not running it. It was being run 24 by two other gentlemen who were experts in the field.</p> <p>13:36:56 25 Q And who were those gentlemen?</p>	<p>13:37:50 1 Sovrin?</p> <p>2 A I believe as the -- as the officer, I think I 3 did. I don't remember, though. I don't remember the 4 corporate structure, as I said.</p> <p>13:37:57 5 Q Okay. Do you know if it was a corporation?</p> <p>6 A I think it was corporation, not an LLC, I 7 think. But I'm not certain.</p> <p>8 Q And do you recall whether you established it 9 the same way you establish Kia Jam Media?</p> <p>13:38:07 10 A I don't.</p> <p>11 Q Or the same way that you established Integrated 12 Administration?</p> <p>13 A I don't recall how I established it.</p> <p>14 Q Okay. And approximately when was it 13:38:16 15 established?</p> <p>16 A In 2010, '11, '12. In that arena. I don't 17 remember specifically.</p> <p>18 Q Right around the same time that you established 19 Integrated Administration?</p> <p>13:38:27 20 A No. After. I think after. Shortly after.</p> <p>21 Q Shortly after?</p> <p>22 A I think so.</p> <p>23 Q Okay.</p> <p>24 A I'm not certain, but --</p> <p>13:38:36 25 Q And where was Sovrin providing medical billing</p>

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<p>13:38:39 1 services?</p> <p>2 A Their office was in Glendale.</p> <p>3 Q Okay. And did you testify -- I believe you</p> <p>4 testified before that you were providing consulting</p> <p>13:38:53 5 services to Sovrin?</p> <p>6 A No.</p> <p>7 Q You never provided any consulting services to</p> <p>8 Sovrin?</p> <p>9 A No. I just -- you know, we -- IA was providing</p> <p>13:39:01 10 the employees. If I said that, that's incorrect.</p> <p>11 Q So was IA leasing employees to Sovrin Health?</p> <p>12 A You're colleague asked me that yesterday. I</p> <p>13 don't what what "leasing employee" means. I don't know</p> <p>14 what that means. We -- they're employees that worked</p> <p>13:39:12 15 there. Their paychecks came from IA, so IA was</p> <p>16 advancing all the expenses for the employees.</p> <p>17 Q Okay. And did Integrated Administration have</p> <p>18 any sort of written agreement with Sovrin Health</p> <p>19 regarding their arrangement with -- arrangement with</p> <p>13:39:27 20 these employees?</p> <p>21 A I don't remember. I don't remember. They had</p> <p>22 employee -- I think they employment agreements. I don't</p> <p>23 remember. They probably had employment agreements,</p> <p>24 yeah, I would imagine.</p> <p>13:39:42 25 Q Have you ever seen any of these employment</p>	<p>13:40:43 1 So I think there was one or two occasions where</p> <p>2 Sovrin did, in fact, pay some of that loan back to IA.</p> <p>3 Q Okay. So your position is that Integrated</p> <p>4 Administration, at least at some point, loaned money to</p> <p>13:40:55 5 Sovrin?</p> <p>6 A Was advancing loans. Was advancing monies to</p> <p>7 Sovrin for Sovrin, yes. And at some point, when they</p> <p>8 started generating a little bit, it wasn't that much</p> <p>9 money. I think was, you know, 10, \$20,000. I don't</p> <p>13:41:08 10 think it was much more than that. I don't remember.</p> <p>11 And then they would keep some of that money for their</p> <p>12 ongoing operations, and they wrote a check to, I think</p> <p>13 it was IA, on one or two occasions. I don't remember</p> <p>14 specifically. Or they wrote it to some other company.</p> <p>13:41:23 15 I don't remember.</p> <p>16 Q Okay. So by advancing money, do you mean</p> <p>17 loaning money, or is that something different?</p> <p>18 A That's advancing money. You know, you need to</p> <p>19 advance for the lease. You know, you got to pay for --</p> <p>13:41:32 20 so you're advancing for expenses hoping that you get</p> <p>21 back paid back.</p> <p>22 Q So it was effectively a loan arrangement?</p> <p>23 A I don't know what you want to call the</p> <p>24 arrangement. I'm telling you what it was. It was</p> <p>13:41:44 25 advancing expenses hoping that you get your money back.</p>
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<p>13:39:44 1 agreements?</p> <p>2 A I don't remember. I think if they were there,</p> <p>3 that's something Steve Piscula would have done because</p> <p>4 they need to have probably paperwork in order to get</p> <p>13:39:52 5 health insurance, and Steve and Frymi's office would</p> <p>6 handle those -- those level of details at the office.</p> <p>7 Q Okay. And is Sovrin still in operation today?</p> <p>8 A No. As I said yesterday, it's not.</p> <p>9 Q What did it stop operating?</p> <p>13:40:06 10 A Sometime after that. I don't remember the</p> <p>11 date.</p> <p>12 Q Did it stop operating around the time when, as</p> <p>13 you described yesterday, things went south?</p> <p>14 A I don't remember when it stopped operating.</p> <p>13:40:17 15 Q Was it approximately sometime in 2013?</p> <p>16 A I don't remember when it stopped operating.</p> <p>17 Q Okay. Have you ever received money from</p> <p>18 Sovrin?</p> <p>19 A Sovrin, at one point towards the end, yeah, I</p> <p>13:40:28 20 think there on one or two occasions where they had</p> <p>21 collected on some of the -- on the medical, on the -- I</p> <p>22 think it was -- whatever type of medical thing they were</p> <p>23 doing they collected some money. And at some point some</p> <p>24 of the money that we had advanced to them was getting</p> <p>13:40:42 25 paid back to, I believe it was to IA.</p>	<p>13:41:47 1 Q Okay. Were there -- was there a written</p> <p>2 agreement reflecting that advancing arrangement?</p> <p>3 A I don't remember. I don't think so. I don't</p> <p>4 know.</p> <p>13:41:53 5 Q Do you know if any collateral was provided in</p> <p>6 connection with that advancing arrangement?</p> <p>7 A There's no collateral that I know of.</p> <p>8 Q Did Sovrin have any relation to Swartz IP?</p> <p>9 A Sovrin was its own entity. Sovrin was its own</p> <p>13:42:14 10 entity. I don't --</p> <p>11 Q Did Sovrin ever provide services to Swartz IP?</p> <p>12 A Sovrin services was medical billing to the</p> <p>13 extent that maybe Swartz IP had an agreement to fund it,</p> <p>14 I don't know what Swartz IP was doing. David -- you</p> <p>13:42:26 15 should ask David that. David Bergstein was the one who</p> <p>16 was dealing with that.</p> <p>17 Q Did Mr. Bergstein have any involvement with the</p> <p>18 operation of Sovrin?</p> <p>19 A No. Not that I know of. Sovrin was run by</p> <p>13:42:49 20 those two guys and one other guy, Larry Twirsky,</p> <p>21 something like that, I think, was the other guy. Larry</p> <p>22 something. Larry-something. Yeah.</p> <p>23 Q So you believe that the two individuals who</p> <p>24 were running Sovrin Health were Ed Defrank and Larry</p> <p>13:43:02 25 Twirsky?</p>

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<p>13:43:02 1 A Robert Silverman, and -- and I think Larry was 2 brought in. I don't remember when or how, but Robert 3 Silverman and Ed Defrank were the two principals. 4 Q Robert Silverman and Ed Defrank? 13:43:15 5 A Yes, sir. 6 Q Okay. Who's Larry Twirsky? 7 A He was brought in, I think, or was going to 8 come in as a consultant, or brought in somehow. He was 9 another expert in the field that did some work for 13:43:22 10 Sovrin. I don't remember the details. 11 Q Okay. What -- what's prompting you to describe 12 these individuals as expert in the field? 13 A If I remember correctly, they'd been in that 14 field for 20-some-odd years each, that's what I 13:43:34 15 remember. 16 Q And how did you learn that? 17 A They -- I don't remember who introduced them to 18 the party. I think David ultimately hired them both. 19 Found them, interviewed them and hired them. But I 13:43:45 20 don't remember who -- I don't know who introduced them 21 to the operation. I don't know that. 22 Q And what prompted Mr. Bergstein to get into the 23 medical billing industry? 24 A I don't know. As he described it to me, it 13:43:58 25 was -- it was a really interesting space. So it was a</p>	<p>13:44:59 1 Mr. Defrank or Mr. Silverman? 2 A I don't know. I don't know. 3 Q Okay. So Mr. Bergstein came to you and 4 expressed an interest in getting involved in the medical 13:45:13 5 billing industry; is that correct? 6 A He came to me and said, "Set up a company. 7 We're getting in the medical billing space." Something 8 to that effect. 9 Q And so you established this -- and entity 13:45:23 10 called Sovrin Health System? 11 A I established an entity called Sovrin. And I t 12 think it's -- I don't remember the official name, but it 13 sounds right, Sovrin Health Systems. 14 Q Is -- I understand that that entity's not 13:45:33 15 operating anymore, but is it still in existence? 16 A I don't know. I think it is. 17 Q Have you taken any steps to dissolve that 18 entity? 19 A I don't remember if I have or not. 13:45:43 20 (Exhibit 20 was marked for 21 identification by the Court Reporter 22 and is attached hereto.) 23 BY MR. LATZER: 24 Q Let's look at Exhibit 20. 13:46:18 25 A Okay.</p>
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<p>13:44:01 1 space that with the right funding behind it could be 2 very lucrative. You're buying, you know, medical bills 3 that don't get paid for a long time, and you're buying 4 them at a discount. And then when you collect, there's 13:44:11 5 a lot of money to be made. Somehow somebody talked him 6 into it. I think it was maybe the Weston guys that 7 talked him into it. 8 Q Okay. So you and Mr. Bergstein had a 9 discussion about getting involved in this industry? 13:44:21 10 A No. David told me we're getting involved in 11 this business. I did not have a discussion about 12 getting involved in medical billing. 13 Q Did you object to getting involved? 14 A No. 13:44:31 15 Q You thought it was a good idea? 16 A The way he described it to me I thought it was 17 a good idea. I thought it was a good opportunity, he 18 had said these Weston guys have a lot of money behind 19 him, and that's what we need to make this really 13:44:40 20 successful. And I thought great. 21 Q And when you're referring to "this" really 22 successful, what are you -- what is "this"? 23 A The medical billing practice, Sovrin. 24 Q Okay. And did Mr. Bergstein have a 13:44:55 25 relationship with the individuals you identified before,</p>	<p>13:46:25 1 Q If you want to flip through that document, let 2 me know when you've had a chance to do so. 3 A Okay. Okay. 4 Q Okay. Can you tell me what these are? 13:46:36 5 A These are Integrated Administration invoices to 6 Sovrin. 7 Q Okay. And are these documents that you've 8 produced in discovery in case? 9 A I don't know. Are these documents we produced 13:46:52 10 in discovery? 11 Q Oh, if you don't know you don't know? 12 A Does this stamp mean we did? 13 Q It is -- it's the IA Bates stamp. But in any 14 even, let me ask you some questions. 13:47:11 15 Have you ever been in possession of these 16 invoices before? 17 A I don't know. 18 Q Have you ever seen these before? 19 A I think I might have seen one or two of them. 13:47:20 20 I don't know. As I said, Steve Piscula and Frymi did a 21 lot of this kind of, you know, behind back office stuff 22 for the company. So I don't know if they did it. I did 23 not create these, I don't think. I don't remember. 24 Q Okay. But as you sit here today, you don't 13:47:36 25 recall if you've seen these?</p>

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13:47:38 1 A I don't recall if I've seen them, but I think I
2 might have. I think I might have seen these, actually.
3 Yes, I vaguely have a recollection that I've seen these.
4 Q Okay. Do you know how these sorts of invoices
13:47:51 5 would be accessed?
6 A As I said, I think Steve and Frymi in the
7 office did a lot of this kind of paperwork. So maybe
8 they -- they created them. And if they e-mailed them to
9 me, I don't really remember.
13:48:08 10 Q Do you know if they were kept electronically?
11 A I do not. I do not know.
12 Q Do you know if there as a file with hard copies
13 of these sorts of invoices?
14 A I do not know. I do not know. Sorry to
13:48:22 15 interrupt you.
16 Q So let's look at the first invoice. It's dated
17 March 31st, 2012.
18 Do you see that on the top right?
19 A I do. Or maybe Harry. Harry might have
13:48:35 20 created these. I don't know who did, but --
21 Q Who's Harry?
22 A Harry Simonian. We talked about him yesterday.
23 He's an accountant at the office.
24 Q And when you say "the office," are you
13:48:44 25 referring to the officer that you shared with

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13:49:41 1 correct?
2 A That's what this is, yes.
3 Q Okay. Now, if you look underneath the section
4 that's entitled "Description."
13:49:48 5 A Huh-uh.
6 Q The first line states, "Monthly fix consulting
7 fees."
8 Do you see that?
9 A I do.
13:49:54 10 Q And in parenthesis it says "(per agreement)."
11 Do you see that?
12 A I do.
13 Q And there's a reference here to the right to
14 \$20,000.
13:50:01 15 Do you see that?
16 A I do.
17 Q Okay. What's your understanding of why this
18 states monthly fixed consulting fees?
19 A This is Sovrin, um, getting billed 20,000 a
13:50:13 20 month for the services of the people that are listed on
21 this invoice.
22 Q Okay. This reflects that Integrated
23 Administration was providing consulting to Sovrin
24 Health; is that right?
13:50:24 25 A That's what this says.

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13:48:45 1 Mr. Bergstein?
2 A Yes. He was an accountant in the office on
3 Colorado.
4 Q Okay. Now, if you look at top right-hand
13:48:54 5 corner of this invoice, there's a reference to
6 inter-company charges.
7 Do you see that?
8 A Yes.
9 Q Do you know what that means?
13:49:03 10 A No.
11 Q Okay. And if you look at the bill to section
12 so the left --
13 A Uh-huh.
14 Q -- do you see that? It says "Sovrin Health
13:49:17 15 System" --
16 A Uh-huh.
17 Q -- and then there's and address identified?
18 A Yes.
19 Q And the address is the same address at which
13:49:24 20 you and Mr. Bergstein shared an office; is that correct?
21 A That's correct. That's where all the bills
22 would go.
23 Q So Integrated Administration is sending a bill
24 from its Colorado Boulevard office to Sovrin Health
13:49:38 25 System at the same Colorado Boulevard office; is that

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13:50:25 1 Q Okay. What consulting was Integrated providing
2 Sovrin?
3 A I don't know what the agreement it refers to.
4 Maybe David was consulting on kind of the direction of
13:50:36 5 the company because the whole thing was his idea. Don
6 Carol was doing IT for the office, Jeff was doing legal
7 work, Steve Piscula was in the office, and Frymi was
8 handling, you know, David's desk. So that's what those
9 people are.
13:50:50 10 Q Okay. But then you're also identified here.
11 A Am I identified as well? Yes.
12 Q What were you doing for Sovrin Health?
13 A As I told you, and we've been through this a
14 bunch, I was the guy at Integrated Administration. I
13:51:00 15 was the one signing the paychecks. I was out trying to
16 raise money so there was money in Integrated
17 Administration to pay for bills as they needed to be
18 paid.
19 Q But what specifically were you doing for Sovrin
13:51:11 20 Health?
21 A I was doing whatever needed to be done. If
22 Sovrin needed insurance, I was the one to go get the
23 insurance. If Sovrin needed health insurance for the
24 employees, I was the one who would go get the health
13:51:21 25 insurance for the employees. I was the one who went and

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<p>13:51:23 1 negotiated the lease on their office. I was the one who</p> <p>2 did whatever needed to be done so that they can have a</p> <p>3 running operation.</p> <p>4 Q Your testimony is that you negotiated the lease</p> <p>13:51:32 5 on Sovrin's office?</p> <p>6 A I believe -- I think I did negotiate the lease</p> <p>7 on Sovrin's office.</p> <p>8 Q What office are you referring to?</p> <p>9 A They had an office in Glendale, as I've</p> <p>13:51:40 10 mentioned already.</p> <p>11 Q And that was different from the office that's</p> <p>12 listed on this "bill to" section?</p> <p>13 A Yes. The "bill to," this is just where the</p> <p>14 paperwork and the corporate would go. There was an</p> <p>13:51:50 15 office in Glendale where dozens of people went to work</p> <p>16 every day for Sovrin.</p> <p>17 Q Your testimony is that dozens of people worked</p> <p>18 for Sovrin?</p> <p>19 A Yeah. Whoever worked for Sovrin, I don't know</p> <p>13:52:01 20 how many people, went to work at this office in Glendale</p> <p>21 every day.</p> <p>22 Q And does this invoice reflect that those</p> <p>23 individuals, including yourself, were providing</p> <p>24 consulting to Integrated Administration?</p> <p>13:52:14 25 A I didn't create this, so I don't -- I -- I</p>	<p>13:53:12 1 things that I know about.</p> <p>2 Q Okay. But you also know about Swartz IP?</p> <p>3 A I do.</p> <p>4 Q But your testimony is that wasn't one of the</p> <p>13:53:18 5 ways in which he raised money?</p> <p>6 A He certainly did raise money for Swartz IP,</p> <p>7 yes.</p> <p>8 Q And that was the money that came that Class TT?</p> <p>9 A Yes. Class TT did, in fact, put money into</p> <p>13:53:30 10 Swartz IP. We've established that.</p> <p>11 Q And there's a reference here next to where it</p> <p>12 says "Monthly fix consulting fees," it says in</p> <p>13 parenthesis, "(per agreement)."</p> <p>14 Do you see that?</p> <p>13:53:39 15 A I do.</p> <p>16 Q Do you know what agreement that's referring to?</p> <p>17 A I do not.</p> <p>18 Q And you're not aware of any written agreement</p> <p>19 for services provided between Sovrin and Integrated</p> <p>13:53:46 20 Administration?</p> <p>21 A If there was an agreement, I don't remember it.</p> <p>22 Q Do you know if this invoice was paid by</p> <p>23 Integrated Administration?</p> <p>24 A I don't know.</p> <p>13:53:57 25 Q Okay. If you look the bottom right, you see a</p>
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<p>13:52:16 1 don't know what people, whoever wrote this, was</p> <p>2 thinking, but --</p> <p>3 Q So you have no idea what this is for?</p> <p>4 A I'm telling you that the work that we did, I</p> <p>13:52:24 5 don't think is considered consulting, but I don't know.</p> <p>6 Maybe -- maybe David, as I said, was consulting with</p> <p>7 Robert Silverman and Ed Defrank and those guys. They</p> <p>8 were the guys who were running the company. Maybe he</p> <p>9 was consulting with them on what they should be doing,</p> <p>13:52:34 10 what they shouldn't be doing, the direction, how to</p> <p>11 raise the money they needed, whatever it was. I don't</p> <p>12 know what David was doing.</p> <p>13 Q But did Mr. Bergstein have any experience in</p> <p>14 the medical billing industry as you knew?</p> <p>13:52:44 15 A Not that I knew of, but he certainly had a lot</p> <p>16 of experience in raising money.</p> <p>17 Q Sort of along the way that he raised money</p> <p>18 through Swartz IP? Is that what you're referring to?</p> <p>19 A No. That's not what I'm referring to.</p> <p>13:52:56 20 Q What are you referring to?</p> <p>21 A I'm referring of the Miramax transaction.</p> <p>22 Q Any other transactions?</p> <p>23 A Yeah, he bought a film library that I know of.</p> <p>24 He raised money for movies, he raised money from another</p> <p>13:53:09 25 fund a while ago for again more movies. Those are the</p>	<p>13:54:04 1 reference to a total due from previous invoice.</p> <p>2 Do you see that?</p> <p>3 A I do.</p> <p>4 Q Okay. Are you aware of a previous invoice from</p> <p>13:54:11 5 before March 12th -- March 31st, 2012?</p> <p>6 A I don't recall.</p> <p>7 Q Let's turn to the second page. It's the one at</p> <p>8 Bates No. 757.</p> <p>9 A Okay.</p> <p>13:54:27 10 Q And this reflects what purports to be another</p> <p>11 invoice from Integrated to Sovrin?</p> <p>12 A I see. It seems like it's the same thing with</p> <p>13 a different date.</p> <p>14 Q And you're not able to identify any consulting</p> <p>13:54:43 15 services that were actually provided at this time by</p> <p>16 Integrated Administration for Sovrin Health; is that</p> <p>17 right?</p> <p>18 A As I mentioned to you, if Jeff Kransenberg</p> <p>19 (sic), Kransberg (sic) -- Kranzdorf or David Bergstein</p> <p>13:54:56 20 were doing consulting for the guys who were running</p> <p>21 Sovrin, I'm not aware of it. I don't what they were</p> <p>22 doing.</p> <p>23 Q Well, let's focus on Mr. Kranzdorf. Are you</p> <p>24 aware of any medical billing experience that</p> <p>13:55:12 25 Mr. Kranzdorf had at this time?</p>

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13:55:14	1 A No. But he's an attorney. Maybe he was, you	13:57:17	1 Q By "companies," you're referring to the
	2 know, helping them draft contracts. I don't know what		2 companies that you and Mr. Bergstein had?
	3 he was doing at the time.		3 A I refer to Integrated Administration company.
	4 Q And, in fact, he is an attorney who was		4 Q You said "companies."
13:55:20	5 subsequently disbarred; right?	13:57:24	5 A And then she substantially went on to do some
	6 A He was disbarred in California, as I said		6 more work for Jeff while Jeff was no longer on the IA
	7 yesterday, yes, but he currently has a license to		7 payroll.
	8 practice law in New York.		8 Q Okay. Why was Mr. Kranzdorf on the IA payroll?
	9 Q Okay. Was he still a member of the bar in		9 A He was an employee of the company. He was a
13:55:32	10 California as of April 30th, 2012?	13:57:37	10 lawyer. He did a bunch of work for David. He wrote up
	11 A I don't know.		11 dozens and dozens of contracts, and documents, and did
	12 Q So your testimony is that Mr. Bergstein or		12 whatever David needed him to do.
	13 Mr. Kranzdorf may have been providing consulting		13 Q Okay. Did he do any payroll-related work?
	14 services to Sovrin at this time?		14 A I don't know what you mean. You've asked that
13:55:58	15 A What I'm telling you is, I don't know what they	13:57:52	15 a bunch of times. I don't understand what "payroll
	16 were doing. If David, who hired those guys, who found		16 related work" is. Did he write checks? No.
	17 them, whose idea it was to start that business was doing		17 Q Well, you described IA as a payroll company.
	18 some consulting work for them, I am unaware of it and I		18 A IA was a company that provided overhead
	19 don't know.		19 services and had employees for various entities. He was
13:56:07	20 Q Well, you're certain that you didn't provide	13:58:03	20 one of those employees who was an attorney who worked
	21 any consulting services for Sovrin at this time?		21 for David, who worked on a multitude of transition --
	22 A I don't -- I'm trying to think of specifically		22 transactions for David, and his compensation came from
	23 what I did. Consulting them on helping them do their		23 IA.
	24 lease, maybe that's considered consulting. I don't		24 I would guess that he had a -- he drafted
13:56:21	25 know. Consulting on what insurance package their	13:58:15	25 contracts, he drafted employment agreements, he drafted
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13:56:23	1 employees should have, I don't know. I was doing	13:58:19	1 whatever legal documents that the folks at Sovrin might
	2 whatever I needed to do to provide those employees a		2 or might not have needed, he might have done that for
	3 paycheck and a place to go and work. If that's		3 them.
	4 considered consulting or not, I don't know.		4 Q So he worked on a multitude of transactions,
13:56:34	5 Q And this invoice makes another reference to an	13:58:28	5 none of which had to do with Integrated Administration's
	6 agreement.		6 business?
	7 Do you see that?		7 A No. Integrated Administration business was
	8 A I do.		8 whatever we could do to generate money. David was
	9 Q And you're not aware of any written agreement		9 working on a number of deals that were supposed to
13:56:40	10 between Sovrin and Integrated such that -- or pursuant	13:58:42	10 generate money, and Jeff worked on all of those. Or not
	11 to which Integrated would provide consulting services to		11 all of those, maybe -- a lot of those with David. And
	12 Sovrin?		12 the goal of all of those would be to generate -- to
	13 A I -- I've already answered that question. If		13 create successful businesses, or generate funding that
	14 there is one, I don't remember it.		14 could come into IA to pay for everything.
13:56:52	15 Q Okay. And that's really true for any services	13:58:53	15 Q Was Integrated Administration, as far as you
	16 that Integrated might have provided to Sovrin. You're		16 were concerned, just a vehicle through which you could
	17 not aware of any written agreement?		17 transfer monies from person to person, or from company
	18 A I can't think of one. If there was one, I		18 to company?
	19 don't remember it.		19 A No, sir.
13:57:04	20 Q There's a reference on here to Sandra	13:59:04	20 Q No?
	21 Carpenter. Do you know who that is?		21 A No.
	22 A Sandra Carpenter is a legal assistant. She's,		22 Q Your testimony was that it was actually a
	23 like, a paralegal who worked on and off for the		23 viable operating business?
	24 companies. She's been working with Jeff for a long		24 A It was. Yes.
13:57:17	25 time.	13:59:17	25 Q Let's look the next invoice, 758.

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13:59:19	1	A Okay.	14:01:26	1	reference to "service charges."
	2	Q And this is an invoice dated May 31st, 2012.		2	Do you see that?
	3	A Okay.		3	A I do.
	4	Q And do you see that?		4	Q The word "service" is misspelled, but you see
13:59:31	5	A I do.	14:01:32	5	what I'm referring to?
	6	Q Okay. And there's a reference again to		6	A I do. "Servsi."
	7	inter-company charges. What does that refer to?		7	Q Do you know what that means, "service charges"?
	8	A As I said earlier, I don't know.		8	A No.
	9	Q You don't know.		9	Q Okay. And this reflects -- strike that.
13:59:41	10	And again, we see a reference under the	14:01:47	10	This invoice reflects a request from Integrated
	11	description "To Monthly fixed consulting fees," and then		11	Administration that Sovrin pay a \$20,000 for reported
	12	in parenthetical it says, "(per agreement)."		12	consulting work; is that correct?
	13	Do you see that?		13	A Just like all the other ones, yes. That's what
	14	A I do.		14	it says.
13:59:53	15	Q Okay. So this is another \$20,000 invoice,	14:02:06	15	Q And if you look at the bottom right, you see at
	16	ostensibly for consulting fees that Integrated		16	this point there's a total unpaid balance of
	17	Administration is sending Sovrin Health; is that		17	\$154,583.33.
	18	correct?		18	Do you see that?
	19	A That's what it reads like.		19	A I do.
14:00:05	20	Q Okay. And we see on the bottom right, there's	14:02:16	20	Q And you're not sure whether that was paid?
	21	an indication of a total unpaid of \$81,038.33.		21	A I'm not sure whether it was paid. I doubt --
	22	Do you see that?		22	Sovrin never had this kind of money to pay it.
	23	A I do.		23	Q Okay. Let's look at the next one, 761. This
	24	Q Do you know if that was paid?		24	is dated October 31st, 2012. And do you see in the top
14:00:19	25	A I don't.	14:02:36	25	right there's another reference to inter-company
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14:00:20	1	Q Do you know if, at any point in time,	14:02:38	1	charges?
	2	Integrated Administration paid any of these invoices?		2	A I do.
	3	A You mean Sovrin.		3	Q Do you see that? And I take it you don't know
	4	Q I'm sorry. Yeah.		4	what that refers to?
14:00:29	5	Do you know if, at any point in time, Sovrin	14:02:42	5	A No.
	6	paid any monies to Integrated Administration pursuant to		6	Q Okay. And so this is an invoice which reflects
	7	these invoices?		7	a request by Sovrin to Integrated Administration for
	8	A As -- as I told you on -- on one or two		8	\$20,000 for purported consulting services; is that
	9	occasions Sovrin did write small checks to, I don't		9	right?
14:00:42	10	remember if it was IA or what entity. I do not know.	14:02:57	10	A That's what it looks like.
	11	But I don't -- Sovrin never really became the big time		11	Q Okay. 762, please.
	12	company we were hoping it to become, so I don't think		12	A Okay.
	13	these ever got paid. But I do not know.		13	Q And this is a November 30th, 2012 invoice from
	14	Q You and Mr. Bergstein were hoping it would		14	Integrated Administration to Sovrin; right?
14:00:54	15	become a big giant company?	14:03:11	15	A Yes.
	16	A Not just us. Everybody involved, I'm sure it		16	Q And again, we see in the top right
	17	was.		17	inter-company charges?
	18	Q And if you could turn to page 760?		18	A Yes.
	19	A Yes, sir.		19	Q And you don't know what that's a reference to?
14:01:12	20	Q This is a -- an invoice dated September 30,	14:03:19	20	A No.
	21	2012 from Integrated Administration to Sovrin; is that		21	Q Okay. And this, again, is a invoice from
	22	correct?		22	Integrated to Sovrin requesting payment of \$20,000 for
	23	A Yes, it is.		23	purported consulting work; is that correct?
	24	Q Okay. Now, if we look the top right-hand		24	A Yes.
14:01:23	25	corner of this invoice, is it says "for," and there's a	14:03:35	25	Q Okay. 763, please.

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14:03:40	1	A Okay.	14:26:44	1	THE VIDEOGRAPHER: We're back on the record at
	2	Q This is a December 31st, 2012 invoice from		2	2:25 p.m.
	3	Integrated Administration to Sovrin; is that correct?		3	BY MR. LATZER:
	4	A Yes.		4	Q Mr. Jam, I'm showing you what I'm marking as
14:03:52	5	Q Okay. And again, this -- there's a reference	14:27:12	5	Exhibit 21.
	6	in the top right to inter-company charges.		6	A Thank you.
	7	Do you see that?		7	(Exhibit 21 was marked for
	8	A Yes.		8	identification by the Court Reporter
	9	Q And you're not sure what that refers to?		9	and is attached hereto.)
14:04:01	10	A Still don't.	14:27:17	10	BY MR. LATZER:
	11	Q Okay. And this is an invoice from Integrated		11	Q Just let me know when you've had a chance to
	12	Administration requesting payment to Sovrin of \$20,000		12	look through that document.
	13	for purported consulting work; is that correct?		13	A I have.
	14	A Yes.		14	Q Okay. Do you know what this is?
14:04:18	15	Q And 759. If you could turn to the next page,	14:27:34	15	A I created this document.
	16	please? I understand that the pages are out of order,		16	Q You created this document?
	17	but the --		17	A I believe so. The front page I did.
	18	A No, I got it.		18	Q Only the front page?
	19	Q -- invoice by dates go in order.		19	A I'm looking at the other pages now. I think I
14:04:28	20	This is a June 30th, 2013 invoice from	14:27:48	20	created the whole thing.
	21	Integrated Administration to Sovrin; is that correct?		21	Q Okay. You believe you --
	22	A Yes.		22	A I don't know what --
	23	Q And this, again, refers in the top right-hand		23	Q -- typed up each page of this document?
	24	corner to service, for which is misspelled --		24	A Except for the last two pages. I don't
14:04:47	25	A Spelled again.	14:28:02	25	remember the last two pages. But we looked at these
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14:04:47	1	Q -- charges. Do you see that?	14:28:05	1	last two pages already elsewhere. But the Excel part,
	2	A Yes.		2	the first few pages, I'm pretty sure I created this
	3	Q And, as before, you don't know what that's		3	document.
	4	referring to?		4	Q Okay. When did you create it?
14:04:53	5	A No.	14:28:16	5	A Years ago.
	6	Q Okay. And this is an invoice from Integrated		6	Q Around this 2011, 2012 text time period?
	7	Administration to Sovrin requesting \$20,000 in payment		7	A No, no, no. No. No. Way after that.
	8	for purported consulting work; is that correct?		8	Q Way after that?
	9	A Yes.		9	A Yeah.
14:05:09	10	Q Now, if we look at the total unpaid amount on	14:28:26	10	Q After things had gone south?
	11	to this invoice, it states \$101,000. I'm sorry,		11	A Yeah, this -- I created this probably three
	12	\$101,083.33; is that correct?		12	years ago, two, three, something like that. Three, four
	13	A Yes.		13	years ago. Somewhere in that neighborhood.
	14	Q Okay. Now, if we look back at the previous one		14	Q And was that after Sovrin had stopped
14:05:27	15	on 763, it reflected a total unpaid amount of	14:28:41	15	operating?
	16	\$214,583.33; is that correct?		16	A I think so.
	17	A Yes.		17	Q Okay. Fair to say that it was sometime
	18	Q Do you have an understanding as to why that		18	after -- or strike that.
	19	amount decreased from December 31st, 2012 to June 30th,		19	Fair to say it was sometime in 2015 or after?
14:05:44	20	2013?	14:28:52	20	A I'm -- I'm not sure, but it sounds right. I
	21	A No, I don't.		21	don't remember.
	22	MR. LATZER: All right. Let's take a break.		22	Q And what prompted you to create this document
	23	THE VIDEOGRAPHER: We are going off the record.		23	then?
	24	The time is 2:03 p.m.		24	A I think it was a conversation I had with David.
14:05:51	25	(A recess was taken.)	14:29:01	25	David was talking about one the lawsuits. It could have

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<p>14:29:03 1 been this one. That whoever had said to him, or one of</p> <p>2 the points that was made is that Sovrin is a company,</p> <p>3 never existed, and that was an argument somebody was</p> <p>4 making. I don't know if it was this, or his criminal</p> <p>14:29:16 5 trial or whatever. I don't remember specifically. And</p> <p>6 I said, "Let me put together a list of everything that</p> <p>7 was spent on Sovrin, and all the employees. And I think</p> <p>8 what I did is I had all the canceled checks to go along</p> <p>9 with it as well at some point.</p> <p>14:29:26 10 Q So in order to show that Sovrin was actually at</p> <p>11 one time an operating entity, you needed to put together</p> <p>12 this document; is that right?</p> <p>13 A No, I didn't need to do it for that reason. I</p> <p>14 did this to show how much Sovrin had cost. How much</p> <p>14:29:44 15 money had gone into Sovrin.</p> <p>16 Q For purposes of showing that it was an</p> <p>17 operating entity?</p> <p>18 A I believe so.</p> <p>19 Q Okay. So you put together this document at</p> <p>14:29:55 20 Mr. Bergstein's request?</p> <p>21 A I don't -- I don't remember if it was his</p> <p>22 request or if I offered to do it. I don't remember.</p> <p>23 Q Did you actually type this out yourself?</p> <p>24 A I believe I did 'cause I had to do all the</p> <p>14:30:05 25 calculations.</p>	<p>14:31:04 1 A Yes.</p> <p>2 Q Okay. And that identifies three different</p> <p>3 years; 2012, 2013 and 2014.</p> <p>4 A Correct.</p> <p>14:31:10 5 Q Do you see that?</p> <p>6 A I do.</p> <p>7 Q Okay. And do those amounts relate to?</p> <p>8 A I would imagine those are the amounts of</p> <p>9 payroll for that year of direct Sovrin employees. The</p> <p>14:31:23 10 addition of allocation is below. It says, "20 percent</p> <p>11 of the salaries for the following employees, David</p> <p>12 Bergstein, Kia, Jeff, Don, Frymi, Steve Piscula," and</p> <p>13 some money in accounting. Because obviously we weren't</p> <p>14 doing full-time Sovrin. So the additional allocation of</p> <p>14:31:40 15 204,000 and 134,000 is 20 percent of the salaries of</p> <p>16 those people I had mention, allocated to Sovrin, for a</p> <p>17 total \$1.442 million over three years spent Sovrin.</p> <p>18 Q All right. Well, let's focus on 2012.</p> <p>19 A Okay.</p> <p>14:32:01 20 Q Your position is that Sovrin had a payroll of</p> <p>21 629,915 -- \$629,915.16?</p> <p>22 A Yeah. That's on the next page, 1753, the</p> <p>23 breakdown.</p> <p>24 Q And where did that number come from?</p> <p>14:32:15 25 A On page 1753.</p>
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<p>14:30:05 1 Q And do you have a copy of this document in</p> <p>2 electronic form?</p> <p>3 A I don't know. Maybe. Yeah.</p> <p>4 Q Was it created using Excel?</p> <p>14:30:15 5 A It was.</p> <p>6 Q Okay. Do you know if you still have access to</p> <p>7 the Excel file?</p> <p>8 A I don't know. Maybe.</p> <p>9 Q Okay. Would that be saved on a computer of</p> <p>14:30:27 10 yours?</p> <p>11 A Didn't we produce this to you?</p> <p>12 Q This document was produced in PDF format.</p> <p>13 A Yeah. I don't know. I can look for it if we</p> <p>14 need to. Digitally.</p> <p>14:30:40 15 Q Do you believe that you used Excel to make this</p> <p>16 document?</p> <p>17 A I do.</p> <p>18 Q Okay. So the first page is entitled "Summary."</p> <p>19 A I don't know if there was another page that went</p> <p>14:30:50 20 on top of this or not. I think I would have written</p> <p>21 "Sovrin" or something on here, so maybe this was the</p> <p>22 work in progress. I don't know which one this is.</p> <p>23 Q Okay. And there's a reference toward the top</p> <p>24 left, it says, "Sovrin Payroll."</p> <p>14:31:02 25 Do you see that?</p>	<p>14:32:19 1 Q Okay. So we see on 1753, these are the gross</p> <p>2 wages, as you identified them, for various -- are these</p> <p>3 various employees of Sovrin?</p> <p>4 A Yes. These were the dedicated Sovrin</p> <p>14:32:37 5 employees.</p> <p>6 Q And were they actually employees of Sovrin?</p> <p>7 A They worked for Sovrin. They were employees</p> <p>8 of -- Integrated Administration was offering the payroll</p> <p>9 services as you know.</p> <p>14:32:46 10 Q Okay. And so how did you go about determining</p> <p>11 each of these individual's gross wages such that they're</p> <p>12 reflected on this document?</p> <p>13 A I probably asked either Majid or Frymi to tell</p> <p>14 me what it was, because they were the ones who had --</p> <p>14:33:02 15 Frymi kept copies of everybody's paychecks and stuff</p> <p>16 like that. Or I asked Majid. I don't remember what I</p> <p>17 did.</p> <p>18 Q And did you have any assistance with inputting</p> <p>19 this information?</p> <p>14:33:17 20 A I asked for the raw information, then I'm</p> <p>21 pretty sure I created this document myself.</p> <p>22 Q You put it in yourself?</p> <p>23 A Yes.</p> <p>24 Q Okay. So again, focusing on 2012, on the first</p> <p>14:33:30 25 page of this document, there's a reference to additional</p>

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<p>14:33:34 1 allocation.</p> <p>2 Do you see that?</p> <p>3 A Yeah. I talked about already.</p> <p>4 Q And so 20 percent of the \$629,915.16 number, is</p> <p>14:33:47 5 204 -- \$212,000.31; is that correct?</p> <p>6 A No, it's not correct.</p> <p>7 Q Okay. Can you explain the relationship between</p> <p>8 the first \$629,000 number and the \$204,000 number?</p> <p>9 A The \$629,000 has nothing to do with the 204.</p> <p>14:33:58 10 The 629 is the addition of all the dedicated employees</p> <p>11 of Sovrin, what they got paid. The \$204,000 is a</p> <p>12 20 percent allocation of the salaries that were paid to</p> <p>13 the people who were not working full-time at Sovrin.</p> <p>14 David, myself, Kranzdorf, Don Carroll, Frymi, Steve</p> <p>14:34:21 15 Piscula, and an allocation of \$20,000 for accounting,</p> <p>16 because Majid was doing the accounting. That's what</p> <p>17 adds up to \$204,000 for 2012.</p> <p>18 For 2013, it's \$134,000. In 2014, there really</p> <p>19 wasn't much so I didn't even do it. 2014, there was</p> <p>14:34:37 20 actual 15,354.50 in payroll. 2013, according to this</p> <p>21 document, was 458,625.94 in payroll. So total payroll</p> <p>22 of the dedicated Sovrin employees, and the additional</p> <p>23 allocation, is \$1,442.3.</p> <p>24 Q Okay. So this reflects that you, and</p> <p>14:34:58 25 Mr. Bergstein and others, were receiving a salary from</p>	<p>14:35:57 1 Q And that's true for all these people who were</p> <p>2 receiving salaries from Integrated Administration?</p> <p>3 A Yes. The way I calculated these numbers, is I</p> <p>4 took 20 percent of their salaries for the year.</p> <p>14:36:16 5 Q Let me just ask that a little clearer.</p> <p>6 All of the individuals referenced under this</p> <p>7 additional allocation reference were receiving salaries</p> <p>8 from Integrated Administration; is that correct?</p> <p>9 A Yes.</p> <p>14:36:29 10 Q Okay. And there's a reference here to 20K in</p> <p>11 accounting, and that was money that was going toward --</p> <p>12 A And I just had a flat \$20,000 for annual</p> <p>13 accounting. I just made that a flat number.</p> <p>14 Q And so Mr. Zarrinkelk received \$20,000 for</p> <p>14:36:42 15 accounting work that he performed for Sovrin?</p> <p>16 A No, that's not correct. I'm allocating \$20,000</p> <p>17 from the fees that were paid him to Sovrin accounting.</p> <p>18 Q Okay. What are you basing that allocation on?</p> <p>19 A I don't remember at the time. I think I just</p> <p>14:37:02 20 went with 20 percent. And this was not an official</p> <p>21 document. This was just a document I did to see roughly</p> <p>22 how much money had been spent on Sovrin?</p> <p>23 Q What do you mean by "it's not an official</p> <p>24 document"?</p> <p>14:37:12 25 A This wasn't done at -- you know, I wasn't --</p>
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<p>14:35:01 1 Sovrin Health?</p> <p>2 A No, it doesn't.</p> <p>3 Q Okay. It says, "Additional allocation is</p> <p>4 comprised of 20 percent of the salaries for the</p> <p>14:35:07 5 following employees."</p> <p>6 A Right. Right. I'm allocating 20 percent of</p> <p>7 the salaries for work being done for Sovrin, because not</p> <p>8 all of salary could be applied to Sovrin, 'cause that's</p> <p>9 not all I was doing. So I've allocated 20 percent of</p> <p>14:35:23 10 the salaries of the people that I mentioned, who would</p> <p>11 part-time basically work on Sovrin, and that's what</p> <p>12 those numbers add up to.</p> <p>13 Q Okay. So is it your testimony that you were</p> <p>14 spending approximately 20 percent of your work -- strike</p> <p>14:35:37 15 that.</p> <p>16 Is it your testimony that you were devoting</p> <p>17 approximately 20 percent of your work towards Sovrin?</p> <p>18 A No. My testimony is that 20 percent of my</p> <p>19 salary was allocated to Sovrin. I don't remember</p> <p>14:35:47 20 specifically how much of my time I was spending on</p> <p>21 Sovrin.</p> <p>22 Q And 20 percent your salary from who?</p> <p>23 A The salary that I was making.</p> <p>24 Q From?</p> <p>14:35:55 25 A From Integrated Administration.</p>	<p>14:37:16 1 you know, 20 percent is just a number I picked out of</p> <p>2 the sky. I just created this document myself to see how</p> <p>3 much money had been spent on Sovrin salaries.</p> <p>4 Q Can you just clarify why this refers to 20K in</p> <p>14:37:32 5 accounting services?</p> <p>6 A Yes. Majid's firm was paid more than \$20,000</p> <p>7 for the year, because he did accounting for a number of</p> <p>8 the entities, as you know. I allocated 20,000 of the</p> <p>9 money that he was paid to Sovrin expenses. So he was</p> <p>14:37:45 10 not paid by Sovrin. I just allocated \$20,000 of his</p> <p>11 services for Sovrin.</p> <p>12 Q Was there any basis for that \$20,000 number?</p> <p>13 A No. I just pulled the number out of thin air.</p> <p>14 Q And you did the same thing for the 20 percent</p> <p>14:38:00 15 number?</p> <p>16 A Yes.</p> <p>17 Q Now, there's a reference on this first page to</p> <p>18 transfers from SIP, Deutsche Bank account to IA Wells</p> <p>19 Fargo account.</p> <p>14:38:12 20 Do you see that?</p> <p>21 A Yes.</p> <p>22 Q And then below that, transfers from SIP Wells</p> <p>23 Fargo account to IA Wells Fargo account.</p> <p>24 Do you see that?</p> <p>14:38:19 25 A Yes. Yes.</p>

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14:38:19	1 Q Okay. So let's look at the first set. It says	14:40:47	1 Q And if you go down towards the bottom, there's
	2 total number of transfers 15.		2 a reference to you and Mr. Bergstein.
	3 Do you see that?		3 Do you see that?
	4 A Yes.		4 A I do.
14:38:25	5 Q And total amount of transfers, 2,015,000.	14:40:57	5 Q And that reflects gross wages of \$493,846.54.
	6 Do you see that?		6 Do you see that?
	7 A I do.		7 A I do.
	8 Q So what prompted you to include information		8 Q Okay. And then this is referring to 2012, this
	9 about transfers from Swartz IP to -- well, strike that.		9 page; is that correct?
14:38:42	10 Why did you reference these transfers from SIP	14:41:23	10 A Yes, I believe so. Yes, it is.
	11 Deutsche Bank account to the Integrated Administration		11 Q And toward the right, there's a 20 percent
	12 Wells Fargo account?		12 notation.
	13 A Probably David's request.		13 Do you see that?
	14 Q And do you have an understanding as to what		14 A Yes, I do.
14:38:55	15 these transfers have to do with this summary that you're	14:41:34	15 Q Now, what were you trying to do, show here?
	16 providing?		16 A Exactly what I already said. I've taken the
	17 A No.		17 salaries of these people, I've taken 20 percent of it,
	18 Q Do you have an understanding of what these		18 and I've come up with the item that goes in the
	19 transfers have to do with Sovrin?		19 additional allocation category, which is on the first
14:39:08	20 A No. I think David probably told me find out	14:41:49	20 page.
	21 how much money had come in from SIP to the two accounts,		21 Q Okay. So this reflects the fact that you and
	22 which I did, and then I did the above calculation to see		22 Mr. Bergstein together, for 2012, received a salary of
	23 how much had gone out to Sovrin employees for payroll.		23 \$493,846.54; is that correct?
	24 Q Okay. But as you sit here today, you have no		24 A That's what it says.
14:39:21	25 understanding as to any relationship between SIP and	14:42:05	25 Q And 20 percent of that salary was being
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14:39:27	1 Sovrin?	14:42:07	1 allocated to Sovrin Health; is that correct?
	2 A I don't -- as I sit here now, I don't know if		2 A That's correct.
	3 the money from -- I don't remember. Maybe the money		3 Q Okay. This \$493,846.54 number, where does that
	4 from SIP came in for the purpose of Sovrin. I don't		4 come from?
14:39:35	5 remember.	14:42:19	5 A The gross sal -- the gross salaries that went
	6 Q Okay. Are there any documents that could		6 out to he and I for the year. It was a combination of
	7 refresh your recollection in that regard?		7 the two.
	8 A Not I know of.		8 Q Did you refer to any documents?
	9 Q Okay. So from -- what information were you		9 A I'm sure I did.
14:39:52	10 able to -- well, strike that.	14:42:28	10 Q Did you get that information from
	11 Did you refer to any documents in order to		11 Mr. Zarrinkelk?
	12 reference these transfers from SIP's bank accounts?		12 A Probably. Either from him, or from Frymi, or
	13 A I think I asked -- probably asked Majid for a		13 from Steve or somebody.
	14 list of deposits in. Maybe that's how I did it. I		14 Q And why did you combine those salaries for you
14:40:12	15 don't remember. Probably did that. I probably asked	14:42:36	15 and Mr. Bergstein?
	16 Majid for the general ledger.		16 A I don't know. I could have combined all of
	17 Q Okay. So you would agree with me, based on		17 them online. It doesn't really matter. I was just
	18 this document, that Integrated Administration received		18 trying to get to that \$204,000 number.
	19 from Swartz IP at least \$2,295,000; is that correct?		19 Q But you see that Mr. Krantzdorf is listed alone
14:40:32	20 A That's what this document says. Yes.	14:42:52	20 for -- for his salary?
	21 Q Okay. Do you have any reason to doubt that		21 A Yes. Maybe those guys can be, you know, carved
	22 that's not accurate?		22 out into legal department, administrative support and
	23 A No. No.		23 accounting services, where David and I were more
	24 Q Okay. Let's look the second page here.		24 administrative. I don't know.
14:40:43	25 A Okay.	14:43:02	25 Q And you'll see next to the numbers for --

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14:43:07	1	A Right.	14:44:26	1	lawsuit?
	2	Q -- the number for Mr. Kranzdorf, it says "legal		2	A No. He asked me to prepare it. I don't know
	3	support."		3	why he needed it, and I think I needed it, too, just to
	4	Is that right?		4	see how much had gone off to Sovrin. And I'm sure once
14:43:12	5	A Yes.	14:44:35	5	I did this, I sent it to him with all the backup. And
	6	Q And for Don C., Frymi and Steve, it says "IT		6	he -- I don't know what he did with it, if it was
	7	administrative support"?		7	helpful to him or not. I don't know.
	8	A Yes.		8	Q But you just told me that he asked you to do it
	9	Q And underneath that is Mr. Zarrinkelk's firm.		9	in connection with a lawsuit; is that not correct?
14:43:21	10	Do you see that?	14:44:44	10	A I think -- no, I think when he -- when we
	11	A Yes, I do.		11	talked, it was either a lawsuit or something. Somehow
	12	Q And there's a reference to accounting services?		12	someone had said that there was a claim that Sovrin was
	13	A Yes.		13	not a real company. I don't specifically what it was,
	14	Q Okay. The entry next to the information for		14	or who had said that to him, and said, "That's bullshit.
14:43:29	15	you and Mr. Bergstein is blank; right?	14:44:56	15	I have all these employees. Put something together to
	16	A Uh-huh.		16	show how much was spent on the employees," and that's
	17	Q So what services were you and Mr. Bergstein		17	what I did.
	18	providing Sovrin Health?		18	Q And you said --
	19	A You've already asked that question a number of		19	A Pardon my -- pardon my language. I apologize.
14:43:42	20	times. We've already been through that. I told you	14:45:03	20	Q -- and you said that when you created this
	21	what I was doing and, you know, I've told you I don't		21	document you also needed it?
	22	know what David was doing in terms of dealing with those		22	A Yeah. I wanted to know how much had been
	23	guys. I've already answered that question.		23	spent. If somebody had said that, I wanted to know how
	24	Q Okay. Is there a reason why you left this		24	much was spent, so we had this document. In case
14:43:50	25	blank?	14:45:14	25	somebody mentioned, it I could say, here, we spent
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14:43:50	1	A It was an internal document. No, I didn't --	14:45:14	1	\$1.4 million on salaries over three years.
	2	no, I don't think it was a big deal.		2	Q Okay. And let's look at the next page. It's
	3	Q Is that because --		3	the one that's Bates numbered 1754.
	4	A It could have said admin there. I don't know.		4	A Got it.
14:43:56	5	Q Is that because you didn't know what you and	14:45:31	5	Q And I believe that this refers to information
	6	Mr. Bergstein had done for Sovrin Health?		6	for 2013; is that correct?
	7	A No.		7	A I believe so. Yes.
	8	Q All right. Right --		8	Q Okay. And there's a reference here to gross
	9	A I didn't feel like I needed to put anything		9	wages for you, Mr. Kranzdorf, Mr. Carroll, Ms. Biedak
14:44:03	10	there.	14:45:54	10	and Mr. Piscula; is that correct?
	11	Q Okay. But it's true that you didn't know what		11	A Yes.
	12	Mr. Bergstein had done for Sovrin Health?		12	Q Okay. And I notice that Mr. Bergstein is not
	13	A I don't know what --		13	listed here.
	14	MR. MIGLER: Asked and answered.		14	A Right.
14:44:07	15	BY MR. LATZER:	14:46:06	15	Q Had Mr. Bergstein stopped performing services
	16	Q Go ahead.		16	for Sovrin at this -- by this time?
	17	A Short of what I've already said a number of		17	A I don't know what he was doing, but he wasn't
	18	times, he's the one who came up with the idea, he's the		18	listed on here because he didn't take any paychecks that
	19	one who found the two guys to run it. I don't know what		19	year.
14:44:15	20	else he was doing on a day-to-day basis with those guys.	14:46:17	20	Q He didn't take any compensation from Sovrin
	21	Q And you've described this as an internal		21	that year?
	22	document; is that right?		22	A It wasn't from Sovrin. It was from Integrated
	23	A Yes.		23	Administration.
	24	Q But isn't it true that Mr. Bergstein asked you		24	Q Okay. He didn't take any compensation from
14:44:23	25	to prepare this for purposes of defending himself in a	14:46:25	25	Integrated Administration for that year?

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<p>14:46:27 1 A That's what I would assume, based not this.</p> <p>2 Q Okay. And how -- how were you able to compile</p> <p>3 this information?</p> <p>4 A I -- I already answered. I either got the</p> <p>14:46:37 5 information from Frymi or Steve, or from Majid.</p> <p>6 Q Just as you did for the previous year?</p> <p>7 A Yes. I did the same thing for all three -- for</p> <p>8 all three years.</p> <p>9 Q Okay. So this reflects that in 2013, you</p> <p>14:46:50 10 received a general salary from Integrated Administration</p> <p>11 for \$24,230.79; is that correct?</p> <p>12 A Correct.</p> <p>13 Q And you were allocating 20 percent of that to</p> <p>14 Sovrin?</p> <p>14:47:04 15 A Yes.</p> <p>16 Q And that 20 percent number was just a number</p> <p>17 that you pulled out of thin air?</p> <p>18 A It's exactly as I already answered. It's the</p> <p>19 same thing for all three years.</p> <p>14:47:14 20 Q Okay. Now we see that Mr. Kranzendorf received</p> <p>21 \$200,000.06 for 2013 from Integrated Administration?</p> <p>22 A Yes. That's all from Integrated</p> <p>23 Administration --</p> <p>24 Q Okay.</p> <p>14:47:25 25 A -- so that's the case.</p>	<p>14:48:17 1 that question.</p> <p>2 Q Okay. And I know I told you this after we</p> <p>3 started after lunch that some of my questions may seem</p> <p>4 repetitive.</p> <p>14:48:24 5 A Yeah.</p> <p>6 Q But they're -- I'm asking --</p> <p>7 A They're exactly repetitive. That's why it's</p> <p>8 getting frustrating.</p> <p>9 Q -- I'm asking them because I need to ask them.</p> <p>14:48:27 10 So if you could just do me a favor and answer with</p> <p>11 respect --</p> <p>12 A So it's the same thing as I told you.</p> <p>13 Q -- just let me talk --</p> <p>14 A Sorry.</p> <p>14:48:33 15 Q -- and then you can talk.</p> <p>16 A I apologize.</p> <p>17 Q With respect to 2013, what services do you</p> <p>18 claim you provided for Sovrin Health?</p> <p>19 A The same thing I offered for previous years.</p> <p>14:48:42 20 Just operational. Doing whatever I could say to bring</p> <p>21 in cash to pay the \$458,000, or whatever portion of what</p> <p>22 I could. Their office, whatever they needed, their</p> <p>23 lease, their insurances, health insurance. Whatever</p> <p>24 needed to be done.</p> <p>14:48:56 25 Q Okay. And the last page of this document,</p>
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<p>14:47:28 1 Q And again, 20 percent was allocated towards</p> <p>2 Sovrin?</p> <p>3 A Yes. It sounded like a fair number.</p> <p>4 Q Now, once again, we see here that for</p> <p>14:47:41 5 Mr. Kranzendorf, there's a description of the services he</p> <p>6 was providing as legal support; is that correct?</p> <p>7 A That's what it says.</p> <p>8 Q And for Mr. Carroll, Ms. Biedak and</p> <p>9 Mr. Piscula, it says they were providing IT and</p> <p>14:47:50 10 administrative services; is that correct?</p> <p>11 A That's correct.</p> <p>12 Q And for Mr. Zarrinkelk's firm we see accounting</p> <p>13 service; is that correct?</p> <p>14 A Yes, it is.</p> <p>14:47:58 15 Q Okay. But next to your name it's blank; is</p> <p>16 that correct?</p> <p>17 A That's correct.</p> <p>18 Q Okay. Is that because you didn't know what</p> <p>19 services you provided for Sovrin Health that year?</p> <p>14:48:06 20 A No, sir. That's not correct.</p> <p>21 Q Okay. Well, what services did you provide for</p> <p>22 Sovrin that year?</p> <p>23 A I've answered that question a number of times.</p> <p>24 Q Well, can you please answer it for 2013, then?</p> <p>14:48:14 25 A It's the same as every other time I've answered</p>	<p>14:48:58 1 Bates numbered 1755 --</p> <p>2 A Yes.</p> <p>3 Q -- this is the information for 2014; is that</p> <p>4 correct?</p> <p>14:49:07 5 A I believe so. Yes.</p> <p>6 Q So 2014 is the year that the company stopped</p> <p>7 operating?</p> <p>8 A That is correct.</p> <p>9 Q Okay. And you didn't perform any services for</p> <p>14:49:16 10 the company that year?</p> <p>11 A I think the number was so miniscule, it didn't</p> <p>12 matter anymore.</p> <p>13 Q Okay. And the only employees you claim who</p> <p>14 perform services for Sovrin during this 2014 time period</p> <p>14:49:29 15 were Mr. Millano and Ms. Potensiano?</p> <p>16 A I believe so. Yes.</p> <p>17 Q Okay. Now, after Mr. Bergstein asked you to</p> <p>18 compile this document, did you send it to him?</p> <p>19 A I believe I sent this to him, yes. I think so.</p> <p>14:49:47 20 Q Did you have a discussion with him about it?</p> <p>21 A I don't really recall.</p> <p>22 Q Okay. Do you know what he did with it?</p> <p>23 A I don't know what David did with it. No.</p> <p>24 Q Did you -- do you recall whether you made any</p> <p>14:50:00 25 changes to the document after you first sent it to him?</p>

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14:50:04	1 A I don't recall. I remember going back to it.	14:52:13	1 A Yes. We've talked about him. Allan Lee was a
	2 I don't have a recollection of doing that.		2 financial consultant. As I mentioned before lunch
	3 Q It's your recollection that you drafted this		3 today, he had been working on and off with David for
	4 document --		4 many years. He does financial modeling and PowerPoint
14:50:12	5 A It was a preposterous allegation that Sovrin	14:52:25	5 presentations, and books and decks for transit -- for --
	6 wasn't a company and didn't have employees.		6 for potential deals and current deals, or -- you know.
	7 Q Just let me finish the question.		7 Q Do you did know what Quant Media Advisors. Inc.
	8 A Oh. Sorry.		8 is?
	9 Q It's your recollection that you drafted this		9 A No. Was that his company?
14:50:20	10 document on one instance and never after that point made	14:52:38	10 Q I'm asking you.
	11 a change to it?		11 A I don't know.
	12 A I think so.		12 Q And who's Mr. Ron Tutor?
	13 Q Okay.		13 A Ron Tutor is David's former partner. He's a --
	14 A If I made a change, it's 'cause maybe there was		14 a successful gentleman. He lives, you know, here. He's
14:50:27	15 an inaccuracy. I don't remember.	14:52:55	15 a construction magnate and he also has many other
	16 Q Okay. Do you know if Mr. Bergstein filed this		16 interests. One was in the media and entertainment for a
	17 document in connection with a lawsuit?		17 number of years. I -- I don't know what he's doing now
	18 A I have no idea what David Bergstein did with		18 besides his construction business.
	19 it.		19 Q Do you have a relationship with Mr. Tutor?
14:50:37	20 Q Okay. But, as you recall, there were no	14:53:10	20 A We have known one another for a long time. I
	21 further discussions with him about it?		21 haven't spoken to him in years.
	22 A I don't recall one.		22 Q Have you ever done business with him?
	23 Q Have you had any discussions with anyone else		23 A I worked for him when I worked at Miramax. He
	24 regarding this document?		24 was one of the owners of Miramax. And when I worked for
14:50:44	25 A I have.	14:53:18	25 Capital Films, he was one of the owners of Capital
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14:50:45	1 Q Who's that?	14:53:24	1 Films.
	2 A My lawyers.		2 Q Okay. Do you know if Integrated Administration
	3 Q Oh, okay. You don't need to tell me about		3 provided services to Mr. Tutor?
	4 that.		4 A Yes.
14:51:06	5 Sir, do you know who John Zhi Wang is?	14:53:29	5 Q What services?
	6 A Not off the top of my head. No.		6 A There was some scanning of documents and, you
	7 Q Do you know what Illuminer Inc, is?		7 know, some legal work for some of his library stuff. He
	8 A Yeah. It was one of the companies that David		8 and David owned libraries together and -- and, you know,
	9 was working with. I think the Weston guys might have		9 some of the guys on the IA payroll worked for them on
14:51:25	10 been involved. Something to do with lightbulb	14:53:43	10 and off over the years.
	11 technology, I think. I don't know much more beyond		11 Q Okay. Did Integrated Administration provide
	12 that.		12 any payroll related services to Mr. Tutor?
	13 Q Do you know if Integrated Administration		13 A Provided employees that were on payroll to work
	14 provided any services for Illuminer Inc.?		14 for him.
14:51:39	15 A I believe so. I think Jeff probably did some	14:53:57	15 Q Okay. All right. Let me show you Exhibit 22.
	16 legal work. I know David did a bunch of work on it.		16 (Exhibit 22 was marked for
	17 I'm sure Frymi and Steve did some work.		17 identification by the Court Reporter
	18 Q So Mr. Krantzdorf was working as an attorney on		18 and is attached hereto.)
	19 Integrated Administration's payroll?		19 BY MR. LATZER:
14:51:58	20 A Jeff was working. He was -- sometimes as an	14:54:15	20 A Thank you.
	21 attorney, he would draft paperwork. He would draft		21 Q I'll give you a minute to flip through that
	22 documents and deal memos and whatnot for David and for		22 document.
	23 whatever was needed. Trying to close deals and help		23 A Okay.
	24 with deals.		24 Q Okay. Can you tell me what this exhibit
14:52:13	25 Q Do you know Allan Lee, Inc. is?	14:54:29	25 consists of?

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14:54:30 1 A A series of invoices.
 2 Q Okay. And these are invoices that were
 3 directed to Integrated Administration?
 4 A Yes. One of them was directed to Illuminer
 14:54:40 5 Inc. No, it's from Illuminer Inc. Okay. Sorry. Okay.
 6 Yes. Okay.
 7 Q All right. Let's look at the first one. It's
 8 from The Barnes Law Firm, and it's date February 7,
 9 2012.
 14:54:58 10 Do you see that?
 11 A I do.
 12 Q What's The Barnes Law Firm?
 13 A There's an attorney named Michael Barnes who
 14 has been an attorney for many years. He was Ron Tutor
 14:55:06 15 and David Bergstein's attorney for a number of years.
 16 Q Okay. Did he -- has he ever performed any
 17 services for you?
 18 A Yes.
 19 Q Okay. What was the nature of those services?
 14:55:19 20 A I worked on this Alliance transaction with him.
 21 And Miramax we worked on together. He was our lawyer on
 22 Miramax. He's a very successful and well-regarded
 23 lawyer, primary entertainment and transactional.
 24 Q All right. So this is what appears to be an
 14:55:36 25 invoice directed to Integrated Administration F/A/O

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14:56:42 1 have come in to the folded companies probably.
 2 Q Okay. Did that work have anything to do with
 3 Integrated Administration's payroll services?
 4 A He was doing legal diligence for a new company
 14:56:57 5 that we're looking to get into. It would have been
 6 something like Sovrin. It would have been another
 7 company that if we would have purchased it, it would
 8 have come in under, and all the employees would have
 9 been integrated -- under the Integrated Administration
 14:57:08 10 banner.
 11 So this was a diligence. This was for a
 12 company we looked at, but ultimately ended up not
 13 purchasing.
 14 Q Why didn't you just have these entities like
 14:57:17 15 Sovrin employ these -- or employ its employees directly?
 16 A I don't know. I think it's probably easier to
 17 have one company do payroll and pay payroll taxes, and
 18 have all the necessary insurances than to do it for five
 19 different entities. It probably makes more financial
 14:57:35 20 sense, I guess.
 21 Q Okay. And there's reference here to legal
 22 services, advance retainer to commence Alliance
 23 diligence.
 24 Do you see that?
 14:57:45 25 A I do.

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14:55:41 1 Boson, LLC.
 2 Do you see that?
 3 A Uh-huh.
 4 Q Okay. What's F/A/O?
 14:55:48 5 A I don't know. For service of is F/S/O, so I
 6 don't know what F/A/O is. Maybe it's a typo.
 7 Q Okay. What's Boson, LLC?
 8 A Boson is -- is a company that David owns, or
 9 owned. I don't know if he does now.
 14:56:01 10 Q And what was the nature of that company?
 11 A I don't know. It's his company. I have
 12 nothing to do with it.
 13 Q And you say it's his company and you have
 14 nothing to do with it, but Integrated Administration was
 14:56:16 15 receiving this invoice on its behalf; is that correct?
 16 A Probably because David was doing work on the
 17 Alliance diligence, and Michael Barnes was the lawyer.
 18 He did some extensive diligence on the Alliance purchase
 19 for us, and -- and that was one of the major deals we
 14:56:31 20 were looking into and diligencing at the time.
 21 Q And what that have to do with Integrated
 22 Administration?
 23 A Integrated Administration was the, uh --
 24 probably the company that David bought and the money to
 14:56:41 25 pay these. Because if we would have done it, it would

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14:57:45 1 Q What's Alliance diligence?
 2 A Alliance was a company -- is a company in
 3 Canada, Alliance Atlantis, which, after we closed on
 4 Miramax, was a -- we were looking for other
 14:57:56 5 entertainment assets to -- to purchase. Michael was the
 6 lawyer on the Miramax transaction, and Alliance Atlantis
 7 we heard was for sale, so we began some extensive
 8 diligence through a distributor, and they have a library
 9 and some rights up in Canada. And -- and I think they
 14:58:06 10 have a Pay TV deal up there, too. I don't remember the
 11 details of the diligence at this time.
 12 Q Okay. So this invoice appears to be requesting
 13 \$165,000; is that correct?
 14 A Yes, it does.
 14:58:24 15 Q Do you know if Integrated Administration paid
 16 those monies?
 17 A I don't.
 18 Q Okay. And so this is a request from Barnes Law
 19 Firm to Integrated Administration to pay for legal work
 14:58:39 20 with -- which related to this Alliance diligence as
 21 you've described?
 22 A Yes.
 23 Q Okay. And do you know what would have prompted
 24 The Barnes Law Firm to send the invoice to Integrated
 14:58:53 25 Administration?

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14:58:55	1	A I'm sure David advised -- asked him to do that.	15:00:58	1	Q Before sitting here today, you don't recall
	2	Q Do you know if Integrated Administration was		2	seeing it?
	3	providing employees Boson, LLC?		3	A I don't remember if I have.
	4	A I'm sure some of the employees were, you know,		4	Q Okay. Is this something that you had access
14:59:04	5	working on Boson. I would imagine Frymi, and Steve and	15:01:03	5	to?
	6	David Bergstein who were three employees had stuff to do		6	A If David sent it to me to get this invoice paid
	7	with Boson.		7	I would have seen it, but I don't remember specifically.
	8	Q Do you know what they were doing for Boson,		8	Q So if he had sent it to you around this time,
	9	LLC?		9	what would you have done with it?
14:59:16	10	A I do not. Supporting David, whatever that was.	15:01:12	10	A If there was instructions to pay it, I would
	11	MR. MIGLER: Counsel, it's almost 3:00 o'clock.		11	have paid it.
	12	I don't know if you want to break for a short time?		12	Q And what would you have done with the physical
	13	MR. LATZER: It's up to you. I probably		13	invoice?
	14	have -- should be no more than another half hour.		14	A I would have e-mailed it to Majid saying, pay
14:59:33	15	THE WITNESS: I mean, if -- can I use my phone?	15:01:19	15	per this invoice.
	16	I'll just e-mail him and say we're 30 minutes away.		16	Q Okay. Was that --
	17	Let's keep going. I'd rather just go and be done.		17	A Or I wrote a check per this invoice, and I'd
	18	MR. LATZER: That's fine.		18	send him a copy of the check and a copy of this invoice.
	19	THE WITNESS: Just one second, please. I		19	Q Did you keep invoices like this in electronic
14:59:42	20	apologize.	15:01:31	20	form?
	21	(Call being made.)		21	A I would e-mail them to Majid. I wouldn't keep
	22	THE WITNESS: Sorry, guys. I apologize.		22	anything.
	23	BY MR. LATZER:		23	Q Would you keep them saved on your computer?
	24	Q Let's turn to the second page of this		24	A To the extent that they were e-mailed, they
15:00:02	25	exhibit --	15:01:38	25	would be on my computer. Once in a while I would clear
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15:00:03	1	A Okay.	15:01:41	1	out my computer or try to reduce the number of e-mails I
	2	Q -- Bates numbered 766.		2	had. But if I -- if I wrote a check on this, because
	3	A Okay.		3	there's no wire instructions, I would imagine I did, I
	4	Q And this purports to be an invoice from		4	would take a photocopy of the check, and I'd put it with
15:00:11	5	Mr. Wang.	15:01:52	5	this, and I would scan it and send it to Majid.
	6	A Uh-huh.		6	Q Okay. Did you have -- did you keep hard copies
	7	Q And it's dated February 28, 2012; is that		7	of invoices like this?
	8	correct?		8	A No.
	9	A Yes, it is.		9	Q No?
15:00:17	10	Q Okay. This invoice is directed to Integrated	15:02:01	10	A I would not.
	11	Administration care of Mr. David Bergstein.		11	Q Did anyone at Integrated Administration?
	12	Do you see that?		12	A Majid would on behalf of the company.
	13	A Yes, I do.		13	Q Okay. And the --
	14	Q And the letter -- the re line of the letter is		14	A Maybe Frymi would, too. I don't know. I don't
15:00:31	15	"Company Matters."	15:02:10	15	know if Frymi did.
	16	Do you see that?		16	Q Okay. And this letter reads, "Dear
	17	A Yes, I do.		17	Mr. Bergstein. Attached is my invoice covering today
	18	Q Okay. Do you know what that refers to?		18	work for IA. Thanks. Regards, John."
	19	A No.		19	A Okay.
15:00:40	20	Q Do you recall receiving this invoice from	15:02:17	20	Q Did I read that correctly?
	21	Mr. Wang in or about February 20, 2012?		21	A You did.
	22	A This says that he sent it to David via e-mail,		22	Q Okay. Now, there's no invoice attached to this
	23	so Mr. Wang didn't send it to me.		23	letter.
	24	Q Okay. Have you seen this invoice?		24	A Not on this document.
15:00:57	25	A I don't recall seeing it.	15:02:31	25	Q Are you aware of whether an invoice was

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15:02:33	1	actually issued?	15:04:40	1	So these guys did the work, and he's billing --
	2	A I don't know.		2	we're billing Illuminer Inc. for the work that they had
	3	Q Okay. And do you know what --		3	done.
	4	A Is there a page 2 to this?		4	Q So you described Illuminer before as
15:02:39	5	Q Sir, this document was produced in discovery as	15:04:49	5	Mr. Bergstein's company?
	6	I'm presenting it to you --		6	A No. It's a company that David worked with. I
	7	A Oh, I see.		7	don't know if it was his company or not. I just heard
	8	Q -- right now.		8	the name, and I know there was something -- a deal he
	9	A I don't know. Well, it says "invoice" on it.		9	was trying to do with them, or for them, or somehow he
15:02:47	10	That's weird.	15:04:55	10	was involved with them for some sort of deal having to
	11	Q Do you know for what services Mr. Wang was		11	do, I think, with lightbulbs. I'm not sure.
	12	requesting payment?		12	Q So Integrated Administration, your company, is
	13	A No, I don't.		13	requesting payment from a company with which
	14	Q Do you know what work he had done to date for		14	Mr. Bergstein was involved; is that correct?
15:02:57	15	Integrated Administration?	15:05:13	15	A Yes. I don't know how he was involved, but he
	16	A I don't know what he was doing.		16	was the guy trying to do a deal with them and did this
	17	Q Okay. Let's turn to the next page, Bates		17	work, and we're sending them a bill per his
	18	numbered 767.		18	instructions.
	19	A Okay.		19	Q Do you know if Illuminer made this payment to
15:03:07	20	Q And this is an invoice from Integrated	15:05:24	20	Integrated Administration?
	21	Administration to Illuminer Inc.; is that correct?		21	A I don't.
	22	A Yes.		22	Q Okay. And do you recall receiving this invoice
	23	Q Okay. So this indicates that Illuminer Inc.		23	on or around January 18, 2012?
	24	had provided services for Integrated Administration at		24	A I don't.
15:03:26	25	this time?	15:05:34	25	Q Okay. Is this the first time you've seen it?
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15:03:28	1	A No. Integrated Administration had provided	15:05:38	1	A I don't remember.
	2	services to Illuminer Inc. Illuminer Inc. is being		2	Q Okay. Let's turn to the next page.
	3	billed \$57,000 for those services. That's why the wire		3	A Okay.
	4	instructions are to IA.		4	Q It's Bates No. 768.
15:03:39	5	Q So what services had Integrated Administration	15:05:46	5	A I see it.
	6	provided to Illuminer Inc. at this time?		6	Q And this appears to be an invoice from Allen
	7	A According to this invoice, it says "Legal		7	Inc. to Integrated Administration; is that correct?
	8	diligence, PowerPoint presentations, and creation of		8	A Yes.
	9	marketing material." It's probably Allan Lee, Jeff		9	Q And you see the line about halfway down, it
15:03:57	10	Kranzdorf and David, doing whatever they were doing.	15:06:00	10	says for "consulting services"?
	11	Q And they were doing this as part of		11	A Uh-huh.
	12	Integrated's payroll company?		12	Q And that's for the period October 27, 2011
	13	A I don't -- you keep asking that and I'm -- I'm		13	through November 3rd, 2011?
	14	not understanding when you say that. Integrated		14	A Okay.
15:04:10	15	Administration had employees that would do work for	15:06:09	15	Q Do you see that?
	16	multiple companies. One of the companies and the deals		16	A Yes.
	17	that David was trying to do was this company called		17	Q Okay. So what consulting services did Allen
	18	Illuminer. I don't know much about it. But the staff		18	Lee Inc. provide Integrated Administration?
	19	at Integrated Administration worked on that.		19	A Allen, as I had told you, was a financial
15:04:22	20	The staff would include David Bergstein, Frymi,	15:06:20	20	analyst. He worked on a lot of the deals with David.
	21	Steve did some stuff probably. I would imagine if it's		21	So whatever it was, he was doing diligence, or financial
	22	legal and diligence it's Allan Lee, it's Jeff Kranzdorf		22	projections, or modeling, PowerPoints for any and all
	23	or maybe or Jeff Solomon. PowerPoint presentations		23	the deals that David was working on.
	24	probably somebody like Allen Lee. And marketing		24	Q Okay. So these were deals that were unrelated
15:04:38	25	material would be somebody like Allen Lee as well.	15:06:33	25	to Integrated Administration?

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15:06:34	1 A You -- you keep saying that again, and I'm	15:08:14	1 was part of what I was describing.
	2 going to keep saying the same thing. I don't understand	2	Q Okay. Do you know if Integrated Administration
	3 when you say that. Integrated Administration was the	3	sent any other invoices to Mr. Tutor?
	4 entity that paid people. He came in and worked on a	4	A I don't remember if they did.
15:06:43	5 multitude of deals, and he got pay from Integrated	15:08:24	5 Q Okay. And do you recall receiving this invoice
	6 Administration. That's how it went down.	6	around January 28, 2013?
	7 Q Okay. Let's turn to the next page, 769.	7	A I don't remember the date, but I remember this.
	8 A Okay.	8	Q You remember seeing this invoice before?
	9 Q And this is, again, another invoice and Allen	9	A I remember this transaction, I remember on
15:06:54	10 Lee Inc. to Integrated Administration. It's dated	15:08:44	10 Tutor, I remember the scanning. I have a vague
	11 November 21st, 2011 --	11	recollection of this invoice and that he paid it.
	12 A Okay.	12	Q You remember this project?
	13 Q -- is that correct?	13	A Yes, I do.
	14 A Yes.	14	Q Okay. Do you know if this invoice was paid?
15:06:57	15 Q And this reads "For consulting services	15:08:55	15 A I believe it was.
	16 October 27, 2011 to November 3rd, 2011."	16	Q Sir, what's your current relationship with
	17 A Yes.	17	Mr. Bergstein?
	18 Q The second half only. Do you see that?	18	A I don't really have a relationship with
	19 A Yes.	19	Mr. Bergstein.
15:07:08	20 Q So what's your understanding of the consulting	15:09:10	20 Q Do you consider him a friend?
	21 services that Allen Lee Inc. provided Integrated	21	A Not anymore.
	22 Administration at this time?	22	Q And why is that?
	23 A It's the same thing. Maybe one of the invoices	23	A Because he completely messed up my life.
	24 was a mistake. The -- the time period seems to be the	24	Q If he called, would you talk to him?
15:07:20	25 same, so maybe he was supposed to bill 10,000 twice, but	15:09:22	25 A That's a good question. I don't know. I'd
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15:07:25	1 he billed 20,000 the first time by mistake. I don't	15:09:25	1 probably ask him why did you do all this shit? Pardon
	2 know. That's what I would think at this point looking	2	me. Sorry. I don't mean to say bad words.
	3 at it here.	3	Q Sir, we've seen several instances where you've
	4 Q Okay. Now, these two invoices from Allen Lee	4	loaned, or claimed that you loaned money through various
15:07:34	5 Inc., do you recall receiving them around this time	15:09:40	5 entities or individually to Integrated Administration;
	6 frame?	6	is that correct?
	7 A Not specifically, no.	7	A Yes, sir.
	8 Q Okay. And before sitting here today, have you	8	Q And from reviewing these bank records, isn't it
	9 seen them?	9	true that you started to loan money to the company
15:07:41	10 A I don't remember.	15:09:53	10 around the July 2012 time frame?
	11 Q Do you know if Integrated Administration paid	11	A I don't remember when. I've done dozens and
	12 these invoices?	12	dozen of the loans, so I have no idea when it started.
	13 A I don't as I sit here.	13	Q And Mr. Zarrinkelk would loan money as well?
	14 Q Okay. Let's look the last page --	14	A Yes. He would -- he would give us short-term
15:07:54	15 A Okay.	15:10:10	15 loans.
	16 Q -- 770.	16	Q Okay. Do you know if you made any loans like
	17 A Okay.	17	that in 2011?
	18 Q And this is an invoice from Integrated	18	A I don't remember when I did them.
	19 Administration to Mr. Tutor?	19	Q And earlier you referred to a warehouse that I
15:08:04	20 A Yes, I see it.	15:10:28	20 believe Integrated Administration leased?
	21 Q And is this referencing the work that you were	21	A No. K.Jam Media was on the lease, not AI.
	22 describing before?	22	Q Okay. K.Jam Media leased space --
	23 A Yes. Part of it, yeah.	23	A Yes.
	24 Q Okay. Was there other work that was done?	24	Q -- for a warehouse? And did Integrated
15:08:12	25 A No. I described other work as well, but this	15:10:38	25 Administration use that space?

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15:10:39	1 A We had sent some employees there to scan some	15:18:57	1 tomorrow I'll have a response.
	2 things for Ron, but -- and some employees were there		2 MR. WALKER: Thank you.
	3 that would pull stuff out of the boxes as needed,		3 MR. LATZER: We can go off the record. Thank
	4 whatever.		4 you.
15:10:50	5 Q Okay. And you -- I believe you said that the	15:19:02	5 THE VIDEOGRAPHER: This concludes the
	6 warehouse was located in the Valley?		6 videotaped deposition Mr. Kia Jam. We are going off the
	7 A Yeah.		7 record at 3:17.
	8 Q Okay. Are you referring to a particular town		8 (The proceedings were concluded
	9 or city?		9 at 3:17 p.m.)
15:10:59	10 A I think it was Chatsworth.	15:19:10	10 ---o0o---
	11 Q Chatsworth?		11
	12 A I'm not sure, but I believe -- I recall it		12
	13 being Chatsworth.		13
	14 Q Okay. Let's take a break.		14
15:11:08	15 THE VIDEOGRAPHER: We are going off the record		15
	16 at 3 --		16
	17 MR. WALKER: I want say something on the record		17
	18 later, but when we come back I'll do it.		18
	19 MR. LATZER: Yeah, we'll -- we'll go back on		19
15:11:14	20 the record. We'll wrap up.		20
	21 THE VIDEOGRAPHER: We're going off the record		21
	22 at 3:09 p.m.		22
	23 (A recess was taken.)		23
	24 THE VIDEOGRAPHER: Back on the record at		24
15:17:54	25 3:15 p.m.		25
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15:17:57	1 MR. LATZER: Mr. Jam, I don't have anything	15:19:10	1 STATE OF CALIFORNIA)
	2 further. Mr. Walker just needs to say something.		2) ss.
	3 MR. WALKER: Do you have any questions, Wil?		3 COUNTY OF _____)
	4 MR. MIGLER: Depending -- I have no questions		4
15:18:04	5 for defendant at this time.	15:19:10	5 I, KIARASH JAM, say I have read the
	6 MR. WALKER: I just wanted to put on the record		6 foregoing deposition and declare under penalty of perjury
	7 that in light of the testimony over the last two days,		7 that my answers as indicated are true and correct.
	8 that -- about the American Express statements, and the		8
	9 fact that they were all provided for Mr. Majid, clearly		9
15:18:19	10 Mr. Jam has possession, custody, control over those	15:19:10	10 _____
	11 statements. I believe they are clearly responsive to		11 (Date)
	12 both Interrogatory No. 23, and request production		12
	13 Nos. 36 and 40. We'd like to have those produced as		13
	14 soon as possible.		14
15:18:33	15 THE WITNESS: Do I say something?		15 _____
	16 MR. WALKER: And we request them going back		16 (Signature)
	17 seven years.	15:19:10	17
	18 THE WITNESS: Do I have to say something?		18
	19 MR. WALKER: I would like to get an idea from		19
15:18:48	20 your office, Wil, as to -- today or tomorrow as to	15:19:10	20
	21 where -- what your position would be on that.		21
	22 MR. MIGLER: Sure. By tomorrow --		22
	23 MR. WALKER: I don't want to put you on the		23
	24 spot at this moment.		24
15:18:57	25 MR. MIGLER: Sure. I understand. But by	15:19:10	25

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1 I, Sandra Mitchell CSR No. 12553, Certified Shorthand
2 Reporter, hereby certify that:
3 I am authorized to administer oaths or affirmations.
4 (Cal. Code of Civ. P. Sec. 2093 (b) and Fed. R. Civ. P. 28(a)).
5 The foregoing proceedings were taken before me at the
6 time and place therein set forth, at which time the witness
7 was duly sworn by me. (Cal. Code Civ. Proc. 2025.330(a),
8 2025.540(a) and Fed. R. Civ. P. 30(f)(1)).
9 The foregoing pages contain a full, true and accurate
10 record of all proceedings and testimony. (Cal. Code Civ.
11 Proc. 2025.540(a) and Fed. R. Civ. P. 30(f)(1)).
12 I am not a relative or employee of the parties,
13 nor financially interested in the action. (Cal. Code Civ.
14 Proc. 2025.320(a)).
15 Before completion of the proceedings, review of the
16 transcript [] was [x] was not requested. If requested,
17 any changes made by the witness (and provided to the reporter)
18 during the period allowed, are appended hereto.
19 (Fed. R. Civ. P. 30(e)).
20 I declare under penalty of perjury under the laws of
21 California that the foregoing is true and correct.
22 Dated this 1st day of April, 2019.
23 _____
24 Sandra Mitchell
25 C.S.R. No. 12553

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